

Compliance Evaluation Inspection
Kerr-McGee Chemical Corporation
Columbus, Mississippi
August 1997

FROM
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. BOX 10385
JACKSON, MISSISSIPPI 39289-0385
TO

COMPLIANCE EVALUATION INSPECTION
JULY 14, 1994
KERR-MCGEE CHEMICAL CORPORATION
COLUMBUS, MISSISSIPPI

POSTMASTER: THIS PARCEL MAY BE OPENED FOR POSTAL INSPECTION IF
NECESSARY, RETURN POSTAGE GUARANTEED.

RCRA Compliance Evaluation Inspection

1. Inspector and Author of Report

Bruce Ferguson, EEII
Mississippi Office of Pollution Control (MOPC)

2. Facility Information

Kerr-McGee Chemical Corporation (KMCC)
Forest Products Division
P. O. Box 906
Columbus, Mississippi 39701
MSD990866329

3. Responsible Company Official

Tony Helms, Plant Manager
Kerr-McGee Chemical Corporation

4. Inspection Participants

Tony Helms, KMCC
Chuck Swann, KMCC
Bruce Ferguson, MOPC

5. Date and Time of Inspection

July 14, 1994, 10:00 a. m. CST

6. Applicable Requirements

Mississippi Hazardous Waste Management Regulations (MHWMR)
Parts 262, 264, 265, 268 and 279 and the facility's Hazardous
Waste Post-Closure Permit No. HW-90-139-01.

7. Facility Description

The site now occupied by Kerr-McGee Chemical Corporation has been used as a wood treating facility since 1928. KMCC acquired the site in 1964 and continues to produce treated railroad ties, switch ties, crossings, and pilings using creosote as a preservative. Pentachlorophenol was also used as a preservative prior to 1976.

The facility is permitted to conduct post-closure and groundwater corrective action activities. In June of 1986, KMCC certified closure of two hazardous waste surface impoundments, an aeration basin and a sedimentation basin in which bottom sediment sludge from process wastewater accumulated. The surface impoundments were replaced by upgrading production process oil/water separators to recycle preservatives for re-application within the production process. The wastewater is then pumped to the wastewater treatment system which operates under a pre-treatment permit and is discharged to the City of Columbus POTW.

Presently, the groundwater corrective action system consists of 12 groundwater recovery wells and two recovery trenches. An additional recovery well has been installed west of the production area, however, recovery from this well has not yet begun. Recovered groundwater is pumped to a storage tank which is utilized as an oil water separator and on to the wastewater treatment system.

In 1988, KMCC installed a concrete drip track to collect excess preservative drippage from treated wood after removal from the pressure cylinder. In December of 1991, the drip track was certified by a professional engineer that the track met the requirements of 40 CFR 264.571.

In addition to the drip pad and the closed surface impoundment, the maintenance shop has a parts washer which may generate a D001 characteristic waste.

9. Findings

The inspection began with the review of required documents which must be maintained at the facility. The facility maintains the permit, contingency plan and groundwater monitoring data at the facility, however, this documentation was not reviewed on the day of the inspection. The facility is scheduled to submit an amended Part B permit application in August of 1994. This submittal is to update the permit to reflect the off-site corrective action program and is to include an updated contingency plan and post-closure cost estimates.

The facility maintains copies of shipping manifests for hazardous waste which is shipped off-site. This waste

consists primarily of contaminated soil and debris from the cleanup of infrequent and incidental drippage in the storage yard. Also included in the waste stream are the stickers used to separate the ties while being treated. The manifests were found to be in proper order, contained land ban notification forms and copies of the manifest were returned from the disposal facility within the required time frame.

The waste analysis plan is maintained at the facility and was reviewed on the day of the inspection. The waste analysis plan appeared to be dated in that the EP toxicity test was referenced and the plan did not reflect the new waste codes for residues from the wood treating process.

Inspection checklists are maintained at the facility for the following: weekly inspections of the closed surface impoundment, weekly inspections of the drip pad, weekly inspections of the black tie storage yard, cleanup of incidental and infrequent drippage reports and drippage certification reports. An assessment of the drip pad certified by a professional engineer is maintained at the facility and is updated annually. All inspection reports were found to have been in proper order with notations made when corrections were needed.

Financial assurance for the facility is provided through the use of a financial test. This information is submitted annually to the MOPC in March and was reviewed prior to the inspection. The assurance includes \$452,000 for post-closure activities, \$127,000 for corrective action activities and \$8,000,000 annual aggregate liability coverage. The cost estimate for corrective action appears to be low when compared to the cost for post-closure activities and considering the basis for the post-closure estimate submitted with the permit application. As mentioned previously KMCC is to submit an amended Part B permit application in August which should include updated cost estimates.

A visual inspection was made of the black tie storage yard, the closed surface impoundment, the drip pad and waste storage areas. Monitoring wells common to these areas were also inspected.

The closed surface impoundment was found to be in good condition. The area is fenced and the impoundment is capped

with gravel. No signs of erosion were noted within the impoundment area.

There are two hazardous waste accumulation areas at the facility. One is a parts washer in the maintenance shop (this area may not contain hazardous waste pending testing). The solvent used in the parts washer is "Perpetrator" and has a flash point of 105° F according to the MSDS. Prior to use the solvent is mixed with diesel fuel, therefore, it is not certain that the waste generated from the parts washer would be a hazardous waste based on ignitability. I was told that the waste from the parts washer is mixed with the used oil. Should the solvent waste prove to be hazardous because of ignitability and the resulting mixture of waste oil and solvent does not exhibit the characteristic of ignitability, then the mixture is regulated as used oil. If the mixture exhibits the characteristic of ignitability, then the mixture should be managed as hazardous waste. Should the spent solvent exhibit a hazardous characteristic other than ignitability and the resulting mixture does not exhibit any hazardous characteristic (not only the characteristic exhibited by the solvent, but any characteristic) then the mixture is subject to regulation as used oil. If the mixture exhibits any hazardous characteristic then the mixture is subject to regulation as hazardous waste. The mixing of a characteristic hazardous waste with used oil is treatment and is subject to permitting requirements unless the appropriate exclusions are met. For example, characteristic hazardous wastes can be treated in tanks or containers provided that the treatment takes place within 90 days. Regardless of whether the spent solvent is mixed with the used oil or not, if the spent solvent is a hazardous waste the waste must be reported as being generated in the annual hazardous waste generation report.

The second waste accumulation area consists of two roll-off boxes which are stored on the drip pad. These roll-off boxes are used to accumulate waste soils and debris from the cleanup of infrequent and incidental drippage. The waste from the roll-off boxes is properly disposed at least once every 90 days.

During the visual inspection of the storage yard a charge of treated ties which had been removed from the drip pad but remained on the rails was observed to be dripping. The

dripping had caused a saturated band of creosote to form at the ends of the trams approximately 1.5" to 2" wide and running the width of the tram. Creosote droplets were observed to be falling a matter of seconds apart. A camera was not taken on the inspection, therefore, photos of the drippage were not taken.

The drip pad was inspected and found to be in good condition. The pad is coated and sloped to drain towards the treatment cylinders for the collection of drippage and precipitation and subsequent treatment in the wastewater treatment system. The drip pad has a curb around the perimeter. Cleaning of the drip pad is conducted daily, although, the cleaning of the entire drip pad may not be completed in one day. The cleaning and cleaning procedure is documented on the inspection checklist.

The monitoring wells which were observed during the inspection of the storage yard appeared to be in good condition. Because of the placement of the monitoring wells within work areas, there are occasions when wells are bumped with operating equipment. This was the case recently for monitoring well CMW-5 which has been changed to a flush mount completion. The well numbers were placed on the wells with a black marker. Some of the markings were faded and the markings were difficult to read if not unreadable.

10. Conclusions

On the day of the inspection, the facility was found to be in apparent violation of the following regulations:

- 1) MHWMR 264.573(k) - After being removed from the treatment vessel, treated wood from pressure and non-pressure processes must be held on the drip pad until drippage has ceased. During the inspection a charge of treated wood which had been removed from the drip pad was observed to be dripping.
- 2) MHWMR 262.11 - A person who generates a solid waste, as defined in MHWMR 261.2, must determine if that waste is a hazardous waste. A hazardous waste determination apparently has not been conducted on the spent solvent from the maintenance parts washer.

- 3) The post-closure and corrective action cost estimates should be checked to assure that the estimates accurately reflect the respective costs.

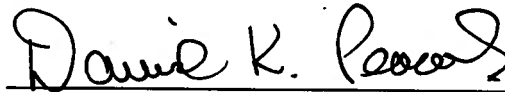
In addition the following conditions were observed which were not determined to be violations but require attention:

- 1) The waste analysis plan should be updated to reflect the changes in the regulations.
- 2) The monitoring wells should be clearly identified in the field to prevent confusion during sampling events.

11. Signatures


Inspector

7/25/94
Date


Supervisor

7/25/94
Date

Part 1

General Site Information

Facility Name: KERR-McGEE CHEMICAL CORPORATION
Address: P.O. Box 906
COLUMBUS, MS 39701
I.D. Number: MSD 090866329
Contact: TONY HELMS
Title: PLANT MANAGER
Phone Number: _____

Type of Ownership:

___ Federal ___ State ___ County ___ Municipal X Private

Facility Status:

X Generator ___ Transporter ___ Treatment ___ Storage X Disposal

Regulatory Status:

___ Interim Status

X Permitted

___ Part B Submitted

___ Part B in Preparation

Principal Inspector Name: BRUCE FERGUSON Title: ERT
Organization: MS DEQ Phone Number: (601) 961-5141

Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Representing</u>
<u>BRUCE FERGUSON</u>		<u>DEQ</u>
<u>CHARLES SWANN</u>		<u>KMCL</u>
<u>TONY HELMS</u>		<u>KMCL</u>

Part _____

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.?

☒ Yes ☐ No ☐ NA

a. If yes, EPA I.D. No. MSD990866329
If no, explain. _____

2. Has facility received hazardous waste from a foreign source?

☐ Yes ☒ No ☐ NA

a. If yes, has it filed a notice with the Regional Administrator?

☐ Yes ☐ No ☒ NA

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility?

☒ Yes ☐ No ☐ NA

a. If yes, does it include: (264.13) (265.13)

1. Parameters for which each waste will be analyzed?

☒ Yes ☐ No ☐ NA

2. Test methods used to test for these parameters? (DATED i.e. EPA)

☒ Yes ☐ No ☐ NA

3. Sampling method used to obtain sample?

☒ Yes ☐ No ☐ NA

4. Frequency with which the initial analyses will be reviewed or repeated?

☐ Yes ☐ No ☐ NA

5. (For offsite facilities) waste analyses that generators have agreed to supply?

☐ Yes ☐ No ☒ NA

6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:

a. Procedures to be used to determine the identity of each movement of waste.

☐ Yes ☐ No ☒ NA

b. Sampling method to be used to obtain representative sample of the waste to be identified.

☐ Yes ☐ No ☒ NA

4. Does the facility provide adequate security through: (264.14) (265.14)

a. 24-hour surveillance system (e.g., television monitoring or guards)?

☐ Yes ☒ No ☐ NA

OR

VISITORS ARE DIRECTED TO THE
OFFICE BEFORE ENTERING PLANT.
PLANT OPERATION 24 HRS / DAY

How long are they kept? INDEFINITE

a. If yes, do they include:

1. Job title and written job description of each position? ☒ Yes ☐ No ☐ NA
2. Description of type and amount of training? ☒ Yes ☐ No ☐ NA
3. Records of training given to facility personnel? ☒ Yes ☐ No ☐ NA

Requirements for Ignitable, Reactive, or Incompatible Waste
(264.17) (265.17)

8. Does facility handle ignitable or reactive wastes? ☐ Yes ☒ No ☐ NA

- a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?
 1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
 2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

- b. Are smoking and open flames confined to specifically designated locations? ☐ Yes ☐ No ☒ NA
- c. Are "No Smoking" signs posted in hazardous areas? ☐ Yes ☐ No ☒ NA
- d. Are precautions documented (Part 264 only)? ☐ Yes ☐ No ☒ NA

9. Check containers

- a. Are containers leaking or corroding? ☐ Yes ☐ No ☒ NA
- b. Is there evidence of heat generation from incompatible wastes? ☐ Yes ☐ No ☒ NA

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31) ☐ Yes ☒ No ☐ NA

If yes, use narrative explanation sheet to explain.

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? (264.53) (265.53) ☒ Yes ☐ No ☐ NA
- a. If yes, is it a revised SPCC Plan? ☐ Yes ☒ No ☐ NA
- b. Does contingency plan include: (264.52) (265.52)
1. Arrangements with local emergency response organizations? ☒ Yes ☐ No ☐ NA
2. Emergency coordinator's names, phone numbers and addresses? ☒ Yes ☐ No ☐ NA
3. List of all emergency equipment at facility and descriptions of equipment? ☒ Yes ☐ No ☐ NA
4. Evacuation plan for facility personnel? ☒ Yes ☐ No ☐ NA
2. Is there an emergency coordinator on site or on call at all times? (264.55) (265.55) ☒ Yes ☐ No ☐ NA

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, does the owner/operator retain copies of all manifests? ☐ Yes ☐ No ☒ NA
1. Are the manifests signed and dated and returned to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, is it accompanied by a shipping paper? ☐ Yes ☐ No ☒ NA
1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72) ☐ Yes ☐ No ☒ NA
- a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? ☐ Yes ☐ No ☒ NA
1. If no, has Regional Administrator been notified? ☐ Yes ☐ No ☒ NA

7. Does the facility submit to the Executive Director reports on releases, fires, and explosions; contamination and monitoring data; and facility closure?

☒ Yes ☐ No ☐ NA

Part _____

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No.? (262.12) ☒ Yes ☐ No ☐ NA
- a. If yes, EPA I.D. No. 990866329

Section B - Manifest

1. Does generator ship waste offsite? (262.20) ☒ Yes ☐ No ☐ NA
- a. If no, do not fill out Sections B and D.
- b. If yes, identify primary offsite facility(s).
Chem waste
2. Does generator use manifest? (262.20) ☒ Yes ☐ No ☐ NA
- a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)? ☐ Yes ☐ No ☒ NA
1. If yes, does generator indicate this when sending waste to a TSD facility? ☐ Yes ☐ No ☒ NA
- b. If yes, does manifest include the following information? ☐ Yes ☐ No ☐ NA
1. Manifest document No. ☒ Yes ☐ No ☐ NA
2. Generator's name, mailing address, telephone number ☒ Yes ☐ No ☐ NA
3. Generator EPA I.D. No. ☒ Yes ☐ No ☐ NA
4. Transporter Name(s) and EPA I.D. No.(s) ☒ Yes ☐ No ☐ NA
5. a. Facility name, address, and EPA I.D. No. ☒ Yes ☐ No ☐ NA
- b. Alternate facility name, address, and EPA I.D. No. ☒ Yes ☐ No ☐ NA
- c. Instructions to return to generator if undeliverable ☒ Yes ☐ No ☐ NA
6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number) ☒ Yes ☐ No ☐ NA
7. Emergency information (optional) (special handling instructions, telephone No.) ☒ Yes ☐ No ☐ NA
8. Is the following certification on each manifest form? ☒ Yes ☐ No ☐ NA

a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators?

☒ Yes ☒ No ☐ NA

- a. If yes, did generator test all wastes to determine nonhazardous characteristics?

☒ Yes ☐ No ☐ NA

1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).

SOLID ENDS FROM TREATED TIES WERE TESTED FOR
TCLP. THIS WASTE HAS BEEN DETERMINED BY EPA
NOT TO BE TBE F034.

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30)

☒ Yes ☐ No ☐ NA

2. a. Are containers to be shipped leaking or corroding?
b. Use sheet to describe containers and condition.

☐ Yes ☒ No ☐ NA

- c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31)

☐ Yes ☒ No ☐ NA

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

4. Does generator mark each package in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

5. Is each container of 110 gallons or less marked with the following label? (262.32)

☐ Yes ☐ No ☒ NA

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

Manifest document No. _____

6. Does generator have placards to offer to transporters? (262.33)

☒ Yes ☐ No ☐ NA

Section F - Special Conditions

1. Has generator received from or transported to a foreign Administrator? ☐ Yes ☒ No ☐ NA
- a. If yes, has he filed a notice with the Regional Administrator? ☐ Yes ☐ No ☒ NA
- b. Is this waste manifested and signed by a foreign cosignee? ☐ Yes ☐ No ☒ NA
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? ☐ Yes ☐ No ☒ NA

Part _____

CONTAINERS CHECKLIST

Section A - Use and Management (264.171) (265.171)

1. Are containers in good condition?

☒ Yes ___ No ___ NA

Section B - Compatibility of Waste With Container (264.172)

1. Is container made of a material that will not react with the waste which it stores?

☒ Yes ___ No ___ NA

Section C - Management of Containers (264.173) (265.173)

1. Is container always closed while holding hazardous waste?

Roll-off Box has cover

☒ Yes ___ No ___ NA

2. Is container handled so that it will not be opened, handled, or stored in a manner which may rupture it or cause it to leak?

☒ Yes ___ No ___ NA

Section D - Inspections (264.174) (265.174)

1. Does owner/operator inspect containers at least weekly for leaks and deterioration?

☒ Yes ___ No ___ NA

Section E - Containment (Part 264) (264.175)

1. Do container storage areas have a containment system?

☒ Yes ___ No ☒ NA

- a. Is the base free of cracks or gaps?

___ Yes ___ No ☒ NA

- b. Is the base sloped or otherwise designed to drain and remove liquids?

___ Yes ___ No ☒ NA

- c. Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container?

___ Yes ___ No ☒ NA

- d. Is any method available to prevent run-on into the containment system?

___ Yes ___ No ☒ NA

- e. Is spilled or leaked material or accumulated precipitation removed from the containment area in a timely manner?

___ Yes ___ No ☒ NA

Part _____

SURFACE IMPOUNDMENTS CHECKLIST

Section A - Design Requirements (264.221) (265.221)

1. Does facility operate one or more surface impoundments? ☐ Yes ☒ No ☐ NA
- a. If yes, has owner/operator installed two or more liners and a leachate collection system for any new units, replacement of any existing units, or lateral expansion of units? ☐ Yes ☐ No ☒ NA
- b. Is owner/operator exempt from double-liner leachate collection system requirements because Regional Administrator has determined that impoundment's design will prevent the migration of hazardous constituents? ☐ Yes ☐ No ☒ NA
- c. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)? ☐ Yes ☐ No ☒ NA
- d. If impoundment does not have a double liner, is it exempt due to one of the following reasons? ☐ Yes ☐ No ☒ NA
1. Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand.
 2. Monofill has at least one liner for which there is no evidence of leaking.
 3. Monofill is located, designed, and operated to ensure that no migration of constituents into ground or surface water occurs.
- e. Does owner/operator take measures to prevent overfilling; wind and wave action; rainfall; run-on; malfunctions of level controllers, alarms, and other equipment; and human error (Part 264)? ☐ Yes ☐ No ☒ NA
- f. Is impoundment surrounded by dikes (Part 264)? ☐ Yes ☐ No ☒ NA

Section B - Operating Requirements

1. Does owner/operator maintain at least 60 cm (2 ft) of freeboard (Part 265)? (265.222) ☐ Yes ☐ No ☒ NA
2. Does owner/operator have certification from a qualified engineer that alternate design features will prevent overtopping? (Part 265) (265.222) ☐ Yes ☐ No ☒ NA

2. Leaking dike?

☐ Yes ☐ No ☒ NA

b. Does plan detail the steps to be followed when removing impoundment from service, including:

1. Shutting off flow into impoundment?

☐ Yes ☐ No ☒ NA

2. Containing any surface leakage?

☐ Yes ☐ No ☒ NA

3. Stopping the leak?

☐ Yes ☐ No ☒ NA

4. Notifying Regional Administrator of problems in writing if leaks cannot be contained?

☐ Yes ☐ No ☒ NA

c. If impoundment was removed from service, did owner/operator take the necessary precautions to rectify problems before restoring impoundment to service?

☐ Yes ☐ No ☒ NA

d. If impoundment was removed from service and was not restored to service, was impoundment closed in accordance with an approved closure plan?

☐ Yes ☐ No ☒ NA

Section G - Closure and Post-Closure (264.228) (265.228)

1. Is a closure plan retained at the facility?

☒ Yes ☐ No ☐ NA

2. At closure, did owner/operator:

a. Remove standing liquids (Part 265)?

☒ Yes ☐ No ☐ NA

b. Remove waste and waste residue (Part 265)?

☐ Yes ☒ No ☐ NA

c. Remove liner (Part 265)?

☐ Yes ☐ No ☒ NA

d. Remove underlying and surrounding contaminated soil?

☐ Yes ☐ No ☐ NA

e. If not, did owner/operator demonstrate to Regional Administrator that the above materials were non-hazardous (Part 265)?

☐ Yes ☐ No ☐ NA

1. If no, has owner/operator closed the impoundment and provided post-closure care (Part 265)?

☒ Yes ☐ No ☐ NA

3. If regulated under Part 264, has owner/operator: (264.228)

a. Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment, and managed them as hazardous waste?

☒ Yes ☐ No ☐ NA

b. Eliminated free liquids by removing or solidifying remaining wastes or waste residues?

☒ Yes ☐ No ☐ NA

c. Stabilized remaining wastes to a bearing capacity sufficient to support final cover?

☒ Yes ☐ No ☐ NA

d. Covered the impoundment with final cover?

☒ Yes ☐ No ☐ NA

4. Did owner/operator leave any residuals in place at closure (Part 264)? (264.228)

☒ Yes ☐ No ☐ NA

Waste Information Worksheet
(To be filled out for each hazardous waste)

Waste Name: Contaminated Soils & Debris
Waste Code: F034, D021

Process Generating Waste: Cleaning of past practices

How was determination made?

☒ Knowledge of Waste. Describe.
☐ Testing. Describe.

Waste Generation Rate (may be estimated) Varies 39.9 tons 1993

Disposal Procedure: Land Disposal

Site/Firm: Chem Waste

Is waste subject to requirements of MHWMR 268? Yes ☐ No ☒
Describe.

Is waste excluded under MHWMR 261.4? Yes ☐ No ☒
Describe.

Appendix I - Satellite Accumulation Area

1. Source/Area: T16 Storage
2. Type waste: F034
3. Condition of Containers: GOOD

- a. Containers closed?
- b. Containers properly labeled?

☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA

4. If > 55 gallons accumulated, has generator complied with 262.34(c)(2)?

☐ Yes ☐ No ☒ NA

Part _____

GROUNDWATER MONITORING CHECKLIST

Section A - Monitoring System

1. Does the facility have a groundwater monitoring system in operation? ☒ Yes ☐ No ☐ NA
- a. If yes, does the system consist of: (265.91)(264.97)
1. At least one upgradient/background well? ☒ Yes ☐ No ☐ NA
2. At least three downgradient wells? ☒ Yes ☐ No ☐ NA
- b. Are wells identified in the field? *Markings labeled* ☒ Yes ☐ No ☐ NA
- c. Are well heads in good condition (i.e. free of cracks)? ☒ Yes ☐ No ☐ NA
- d. Are well heads locked? ☒ Yes ☐ No ☐ NA
- e. Do well heads have bumper guards or are otherwise protected? *Some have guard* ☐ Yes ☐ No ☐ NA

Section B - Sampling and Analysis (Part 264)

1. Does the facility obtain and analyze samples from the groundwater monitoring system? ☒ Yes ☐ No ☐ NA
2. Has facility developed and followed a groundwater sampling and analysis plan? (264.97(d)) ☒ Yes ☐ No ☐ NA
- a. If yes, does this plan include procedures and techniques for:
1. Sample collection? ☒ Yes ☐ No ☐ NA
2. Sample preservation? ☒ Yes ☐ No ☐ NA
3. Analytical procedures? ☒ Yes ☐ No ☐ NA
4. Chain-of-custody control? ☒ Yes ☐ No ☐ NA
5. Determining the groundwater surface elevation? ☒ Yes ☐ No ☐ NA
3. Has facility specified a statistical method to be used in evaluating groundwater monitoring data? ☐ Yes ☒ No ☐ NA
4. Is all groundwater monitoring data recorded in the operating record? ☒ Yes ☐ No ☐ NA

Section F - Sampling and Analysis (Part 265)

1. Has the facility developed and followed a groundwater sampling and analysis plan? ~~Yes~~ ___ No ___ NA
- a. If yes, does the plan include procedures and techniques for:
1. Sample collection? ~~Yes~~ ___ No ___ NA
2. Sample preservation? ~~Yes~~ ___ No ___ NA
3. Analytical procedure? ~~Yes~~ ___ No ___ NA
4. Chain-of-custody control? ~~Yes~~ ___ No ___ NA
2. Has the owner/operator established initial background concentrations or values of all parameters specified in 265.92(b)? ~~Yes~~ ___ No ___ NA
- a. Samples collected to establish background quality (from above)? ~~Yes~~ ___ No ___ NA
- b. Samples collected to indicate contamination (from above)? ~~Yes~~ ___ No ___ NA
- c. Elevation of groundwater surface at each monitoring well at each sampling event? ~~Yes~~ ___ No ___ NA

Section G - Preparation, Evaluation, and Response (Part 265 only) (265.93)

1. Did owner/operator prepare an outline of a groundwater quality assessment program? ~~Yes~~ ___ No ___ NA
- a. If yes, did program determine the following:
1. Whether hazardous waste or hazardous waste constituents have entered the groundwater? ~~Yes~~ ___ No ___ NA
2. Rate and extent of hazardous waste or hazardous waste constituent migration? ~~Yes~~ ___ No ___ NA
3. Concentrations of hazardous waste or hazardous waste constituents in groundwater? ~~Yes~~ ___ No ___ NA
- b. For each well, has owner/operator calculated the arithmetic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean? ___ Yes ___ ~~No~~ ___ NA
- c. Has owner/operator submitted information documenting any significant increase in comparisons for up-gradient wells (or decrease in pH)? ___ Yes ___ No ___ NA
- d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional groundwater samples from

obtained under No. 3c in Section F above to determine whether the requirements for locating monitoring wells are satisfied?

Yes No ☒ NA

- a. If evaluation shows that the requirements for monitoring wells are not satisfied, has owner/operator modified the number, location, or depth of the monitoring wells to bring the system into compliance?

Yes No ☒ NA

Section H - Recordkeeping and Reporting (Part 265 only) (265.94)

1. Unless owner/operator is monitoring to satisfy the requirements of Section 265.93(d)(4), does owner/operator:

- a. Keep records of the analyses required in Section 265.92(c) and (d), groundwater surface elevations required in 265.93(b) throughout the active life of the facility and throughout post-closure?

☒ Yes No NA

- b. Report the following information to the Executive Director:

1. Within 15 days of analysis for each quarterly sampling event, does owner/operator submit results of background concentrations?
2. Does owner/operator inform the Executive Director about any parameters that exceed maximum contaminant levels listed in Appendix III?
3. (Annually) does owner/operator report concentrations or values of parameters listed in Section 265.92(b)(3) for each well, including required evaluations for these parameters under Section 265.93(b)?

☒ Yes No NA

☒ Yes No NA

☒ Yes No NA

- a. Does owner/operator also identify differences from initial background concentrations found in the upgradient wells no later than March 1 following each calendar year?

☒ Yes No NA

2. Does owner/operator submit results of the groundwater surface elevations under Section 265.93(f), along with a description of the response, if needed?

Yes No ☒ NA

Part _____

FINANCIAL REQUIREMENTS CHECKLIST

Section A - Closure

1. Is facility required to provide financial assurance for closure? Yes No NA
- a. Type of financial assurance Financial Test
- b. Amount of closure costs _____
1. Date of most recent adjustment _____
- c. Effective date of mechanism _____
- d. Expiration date of mechanism _____
- e. Is instrument adequate? Yes No NA

Section B - Post-Closure

1. Is facility required to provide financial assurance for post-closure care? XYes No NA
- a. Type of financial assurance Financial Test
- b. Amount of closure costs \$452,000
1. Date of most recent adjustment March 1994
- c. Effective date of mechanism March 1994
- d. Expiration date of mechanism March 1995
- e. Is instrument adequate? XYes No NA

Section C - Corrective Action

1. Is facility required to provide financial assurance for corrective action? XYes No NA
- a. Type of financial assurance Financial Test
- b. Amount of closure costs 177,000
1. Date of most recent adjustment March 1994
- c. Effective date of mechanism March 1994
- d. Expiration date of mechanism March 1995
- e. Is instrument adequate? XYes No NA

Section D - Liability Requirements

1. Is facility required to provide liability coverage for sudden accidental occurrences? XYes No NA
- a. Type of assurance Financial Test
- b. Is amount at least \$1 million per occurrence, \$2 million annual aggregate? Yes No NA
- c. Effective date of mechanism March 1994

1. Does the owner operator maintain a contingency plan for the management of infrequent and incidental spills?

yes no

Does the plan at a minimum describe how the facility will do the following:

- a. Clean up the drippage?
- b. Document the cleanup?
- c. Retain documents for three years?
- d. Manage the contaminated media consistent with regulations?

~~yes~~ no
~~yes~~ no
~~yes~~ no

~~yes~~ no

1988

2. When was the drip pad constructed?

3. For drip pads constructed before December 6, 1990, does the owner operator maintain a written assessment of the drip pad certified by a qualified registered professional engineer?

~~yes~~ no

- a. Is the assessment recertified annually?

~~yes~~ no

4. Is the drip pad constructed of non-earthen material with the exception of wood and non-structurally supported asphalt?

~~yes~~ no

5. Is the drip pad sloped to free-drain drippage and precipitation?

~~yes~~ no

6. Does the drip pad have a curb or berm around the perimeter?

~~yes~~ no

7. Does the drip pad have a hydraulic conductivity of 10^{-7} cm/s or less or have a coating with a hydraulic conductivity of 10^{-7} cm/s or less? (If yes go to 11)

~~yes~~ no

8. Is there a synthetic liner below the drip pad?

yes no NA

9. Is there a leakage detection system immediately above the liner?

yes no NA

10. Is there a leakage detection system immediately above the liner?

yes no NA

- a. Is the date, time, and quantity of any leakage removal documented in the operating log?

yes no NA

11. Is the drip pad free of cracks, gaps and corrosion?

~~yes~~ no

12. Does the operator maintain a run-on control system?

~~yes~~ no

13. Does the operator maintain a run-off control system capable of handling a 25 year 24 hour storm event?
14. At what frequency is drippage and accumulated precipitation removed from the pad?
15. At what frequency is the drip pad cleaned?
16. Is the cleaning and cleaning procedure documented?
17. Is the drip pad inspected weekly?
18. Are treatment vessels held on the pad until dripping has ceased?
19. Are collection units associated with run-on/run-off control emptied or otherwise managed as soon as possible after storm events?

yes no

daily

daily

yes no

yes no

yes no

yes no

FROM
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. BOX 10385
JACKSON, MISSISSIPPI 39289-0385
TO

COMPLIANCE EVALUATION INSPECTION
JULY 14, 1994
KERR-McGEE CHEMICAL CORPORATION
COLUMBUS, MISSISSIPPI

POSTMASTER: THIS PARCEL MAY BE OPENED FOR POSTAL INSPECTION IF
NECESSARY, RETURN POSTAGE GUARANTEED.

RCRA Compliance Evaluation Inspection

1. Inspector and Author of Report

Bruce Ferguson, EEII
Mississippi Office of Pollution Control (MOPC)

2. Facility Information

Kerr-McGee Chemical Corporation (KMCC)
Forest Products Division
P. O. Box 906
Columbus, Mississippi 39701
MSD990866329

3. Responsible Company Official

Tony Helms, Plant Manager
Kerr-McGee Chemical Corporation

4. Inspection Participants

Tony Helms, KMCC
Chuck Swann, KMCC
Bruce Ferguson, MOPC

5. Date and Time of Inspection

July 14, 1994, 10:00 a. m. CST

6. Applicable Requirements

Mississippi Hazardous Waste Management Regulations (MHWMR)
Parts 262, 264, 265, 268 and 279 and the facility's Hazardous
Waste Post-Closure Permit No. HW-90-139-01.

7. Facility Description

The site now occupied by Kerr-McGee Chemical Corporation has been used as a wood treating facility since 1928. KMCC acquired the site in 1964 and continues to produce treated railroad ties, switch ties, crossings, and pilings using creosote as a preservative. Pentachlorophenol was also used as a preservative prior to 1976.

The facility is permitted to conduct post-closure and groundwater corrective action activities. In June of 1986, KMCC certified closure of two hazardous waste surface impoundments, an aeration basin and a sedimentation basin in which bottom sediment sludge from process wastewater accumulated. The surface impoundments were replaced by upgrading production process oil/water separators to recycle preservatives for re-application within the production process. The wastewater is then pumped to the wastewater treatment system which operates under a pre-treatment permit and is discharged to the City of Columbus POTW.

Presently, the groundwater corrective action system consists of 12 groundwater recovery wells and two recovery trenches. An additional recovery well has been installed west of the production area, however, recovery from this well has not yet begun. Recovered groundwater is pumped to a storage tank which is utilized as an oil water separator and on to the wastewater treatment system.

In 1988, KMCC installed a concrete drip track to collect excess preservative drippage from treated wood after removal from the pressure cylinder. In December of 1991, the drip track was certified by a professional engineer that the track met the requirements of 40 CFR 264.571.

In addition to the drip pad and the closed surface impoundment, the maintenance shop has a parts washer which may generate a D001 characteristic waste.

9. Findings

The inspection began with the review of required documents which must be maintained at the facility. The facility maintains the permit, contingency plan and groundwater monitoring data at the facility, however, this documentation was not reviewed on the day of the inspection. The facility is scheduled to submit an amended Part B permit application in August of 1994. This submittal is to update the permit to reflect the off-site corrective action program and is to include an updated contingency plan and post-closure cost estimates.

The facility maintains copies of shipping manifests for hazardous waste which is shipped off-site. This waste

consists primarily of contaminated soil and debris from the cleanup of infrequent and incidental drippage in the storage yard. Also included in the waste stream are the stickers used to separate the ties while being treated. The manifests were found to be in proper order, contained land ban notification forms and copies of the manifest were returned from the disposal facility within the required time frame.

The waste analysis plan is maintained at the facility and was reviewed on the day of the inspection. The waste analysis plan appeared to be dated in that the EP toxicity test was referenced and the plan did not reflect the new waste codes for residues from the wood treating process.

Inspection checklists are maintained at the facility for the following: weekly inspections of the closed surface impoundment, weekly inspections of the drip pad, weekly inspections of the black tie storage yard, cleanup of incidental and infrequent drippage reports and drippage certification reports. An assessment of the drip pad certified by a professional engineer is maintained at the facility and is updated annually. All inspection reports were found to have been in proper order with notations made when corrections were needed.

Financial assurance for the facility is provided through the use of a financial test. This information is submitted annually to the MOPC in March and was reviewed prior to the inspection. The assurance includes \$452,000 for post-closure activities, \$127,000 for corrective action activities and \$8,000,000 annual aggregate liability coverage. The cost estimate for corrective action appears to be low when compared to the cost for post-closure activities and considering the basis for the post-closure estimate submitted with the permit application. As mentioned previously KMCC is to submit an amended Part B permit application in August which should included updated cost estimates.

A visual inspection was made of the black tie storage yard, the closed surface impoundment, the drip pad and waste storage areas. Monitoring wells common to these areas were also inspected.

The closed surface impoundment was found to be in good condition. The area is fenced and the impoundment is capped

with gravel. No signs of erosion were noted within the impoundment area.

There are two hazardous waste accumulation areas at the facility. One is a parts washer in the maintenance shop (this area may not contain hazardous waste pending testing). The solvent used in the parts washer is "Perpetrator" and has a flash point of 105° F according to the MSDS. Prior to use the solvent is mixed with diesel fuel, therefore, it is not certain that the waste generated from the parts washer would be a hazardous waste based on ignitability. I was told that the waste from the parts washer is mixed with the used oil. Should the solvent waste prove to be hazardous because of ignitability and the resulting mixture of waste oil and solvent does not exhibit the characteristic of ignitability, then the mixture is regulated as used oil. If the mixture exhibits the characteristic of ignitability, then the mixture should be managed as hazardous waste. Should the spent solvent exhibit a hazardous characteristic other than ignitability and the resulting mixture does not exhibit any hazardous characteristic (not only the characteristic exhibited by the solvent, but any characteristic) then the mixture is subject to regulation as used oil. If the mixture exhibits any hazardous characteristic then the mixture is subject to regulation as hazardous waste. The mixing of a characteristic hazardous waste with used oil is treatment and is subject to permitting requirements unless the appropriate exclusions are met. For example, characteristic hazardous wastes can be treated in tanks or containers provided that the treatment takes place within 90 days. Regardless of whether the spent solvent is mixed with the used oil or not, if the spent solvent is a hazardous waste the waste must be reported as being generated in the annual hazardous waste generation report.

The second waste accumulation area consists of two roll-off boxes which are stored on the drip pad. These roll-off boxes are used to accumulate waste soils and debris from the cleanup of infrequent and incidental drippage. The waste from the roll-off boxes is properly disposed at least once every 90 days.

During the visual inspection of the storage yard a charge of treated ties which had been removed from the drip pad but remained on the rails was observed to be dripping. The

dripping had caused a saturated band of creosote to form at the ends of the trams approximately 1.5" to 2" wide and running the width of the tram. Creosote droplets were observed to be falling a matter of seconds apart. A camera was not taken on the inspection, therefore, photos of the drippage were not taken.

The drip pad was inspected and found to be in good condition. The pad is coated and sloped to drain towards the treatment cylinders for the collection of drippage and precipitation and subsequent treatment in the wastewater treatment system. The drip pad has a curb around the perimeter. Cleaning of the drip pad is conducted daily, although, the cleaning of the entire drip pad may not be completed in one day. The cleaning and cleaning procedure is documented on the inspection checklist.

The monitoring wells which were observed during the inspection of the storage yard appeared to be in good condition. Because of the placement of the monitoring wells within work areas, there are occasions when wells are bumped with operating equipment. This was the case recently for monitoring well CMW-5 which has been changed to a flush mount completion. The well numbers were placed on the wells with a black marker. Some of the markings were faded and the markings were difficult to read if not unreadable.

10. Conclusions

On the day of the inspection, the facility was found to be in apparent violation of the following regulations:

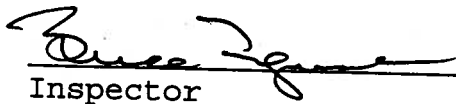
- 1) MHWMR 264.573(k) - After being removed from the treatment vessel, treated wood from pressure and non-pressure processes must be held on the drip pad until drippage has ceased. During the inspection a charge of treated wood which had been removed from the drip pad was observed to be dripping.
- 2) MHWMR 262.11 - A person who generates a solid waste, as defined in MHWMR 261.2, must determine if that waste is a hazardous waste. A hazardous waste determination apparently has not been conducted on the spent solvent from the maintenance parts washer.

- 3) The post-closure and corrective action cost estimates should be checked to assure that the estimates accurately reflect the respective costs.

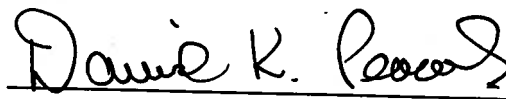
In addition the following conditions were observed which were not determined to be violations but require attention:

- 1) The waste analysis plan should be updated to reflect the changes in the regulations.
- 2) The monitoring wells should be clearly identified in the field to prevent confusion during sampling events.

11. Signatures


Inspector

7/25/94
Date


Supervisor

7/25/94
Date

Part 1

General Site Information

Facility Name: KERR-McGEE CHEMICAL CORPORATION
 Address: P.O. Box 906
COLUMBUS, MS 39701
 I.D. Number: MSD 000866329
 Contact: JOE HELMS
 Title: Plant Manager
 Phone Number: _____

Type of Ownership:

___ Federal ___ State ___ County ___ Municipal X Private

Facility Status:

X Generator ___ Transporter ___ Treatment ___ Storage X Disposal

Regulatory Status:

___ Interim Status
X Permitted

___ Part B Submitted
 ___ Part B in Preparation

Principal Inspector Name: BRUCE FERGUSON Title: ERT
 Organization: MS DEQ Phone Number: (601) 961-5141

Inspection Participants:

Name	Title	Representing
<u>BRUCE FERGUSON</u>		<u>DEQ</u>
<u>CHARLES SWANN</u>		<u>KMCC</u>
<u>JOE HELMS</u>		<u>KMCC</u>

- b. 1. Artificial or natural barrier around facility
(e.g., fence or fence and cliff)?

☒ Yes ☐ No ☐ NA

Describe FENCE

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)?

☐ Yes ☐ No ☐ NA

Describe _____

General Inspection Requirements (264.15) (265.15)

5. Does the owner/operator maintain a written schedule at the facility for inspecting: not inspected

- a. Monitoring equipment?
b. Safety and emergency equipment?
c. Security devices:
d. Operating and structural equipment?
e. Types of problems of equipment:

☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA

1. Malfunction
2. Operator error
3. Discharges

☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA

6. Does the owner/operator maintain an inspection log?

☐ Yes ☐ No ☐ NA

- a. If yes, does it include:

1. Date and time of inspection?
2. Name of inspector?
3. Notation of observations?
4. Date and nature of repairs or remedial action?
5. Identification of potential problems?

☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA

- b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.)

☐ Yes ☐ No ☐ NA

- c. Are records kept a minimum of three years?

☐ Yes ☐ No ☐ NA

Personnel Training (264.16) (265.16)

7. Does the owner/operator maintain personnel training records at the facility?

☒ Yes ☐ No ☐ NA

Date of most recent training: _____

Part _____

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.?
☒ Yes ☐ No ☐ NA
- a. If yes, EPA I.D. No. MSD990866329
If no, explain. _____
2. Has facility received hazardous waste from a foreign source?
☐ Yes ☒ No ☐ NA
- a. If yes, has it filed a notice with the Regional Administrator?
☐ Yes ☐ No ☒ NA

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility?
☒ Yes ☐ No ☐ NA
- a. If yes, does it include: (264.13) (265.13)
1. Parameters for which each waste will be analyzed?
☒ Yes ☐ No ☐ NA
2. Test methods used to test for these parameters? (DATED i.e. EPA)
3. Sampling method used to obtain sample?
☒ Yes ☐ No ☐ NA
4. Frequency with which the initial analyses will be reviewed or repeated?
☒ Yes ☐ No ☐ NA
5. (For offsite facilities) waste analyses that generators have agreed to supply?
☐ Yes ☐ No ☐ NA
6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:
- a. Procedures to be used to determine the identity of each movement of waste.
☐ Yes ☐ No ☒ NA
- b. Sampling method to be used to obtain representative sample of the waste to be identified.
☐ Yes ☐ No ☒ NA
4. Does the facility provide adequate security through: (264.14) (265.14)
- a. 24-hour surveillance system (e.g., television monitoring or guards)?
☐ Yes ☒ No ☐ NA
- OR VISITORS ARE DIRECTED TO THE OFFICE BEFORE ENTERING PLANT.
PLANT OPERATION 24 HRS / DAY

4. Does the owner/operator keep a written operating record at the facility? (264.73) (265.73)

☒ Yes ☐ No ☒ NA

a. If yes, does it include:

1. Description and quantity of each hazardous waste received? ☐ Yes ☐ No ☒ NA
2. Methods and dates of treatment, storage, and disposal? ☐ Yes ☐ No ☒ NA
3. Location and quantity of each hazardous waste at each location? ☐ Yes ☐ No ☒ NA
4. Cross-references to manifests/shipping papers? ☐ Yes ☐ No ☒ NA
5. Records and results of waste analyses? ☒ Yes ☐ No ☒ NA
6. Report of incidents involving implementation of the contingency plan? ☒ Yes ☐ No ☒ NA
7. Records and results of required inspections? ☒ Yes ☐ No ☒ NA
8. Monitoring, testing, and analytical data, for groundwater required by Subpart F? ☒ Yes ☐ No ☒ NA
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? ☒ Yes ☐ No ☒ NA
10. Notices of generators as specified in Section 264.12(b) (Part 264)? ☒ Yes ☐ No ☐ NA

b. Does facility have copy of permit on site?

☐ Yes ☐ No ☐ NA

5. Does the facility submit a ^{Annual} ~~biennial~~ report by March 1 every ~~even-numbered~~ year? (264.75) (265.75)

☒ Yes ☐ No ☐ NA

a. If yes, do reports contain the following information:

1. EPA I.D. number? ☒ Yes ☐ No ☐ NA
2. Date and year covered by report? ☒ Yes ☐ No ☐ NA
3. Description/quantity of hazardous waste? ☒ Yes ☐ No ☐ NA
4. Treatment, storage, and disposal methods? ☒ Yes ☐ No ☐ NA
5. Monitoring data under Section 265.94(a)(2) and (b)(2) (Part 265)? ☒ Yes ☐ No ☐ NA
6. Most recent closure and post-closure cost estimates? ☒ Yes ☐ No ☐ NA
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? ☒ Yes ☐ No ☐ NA
8. Certification signed by owner/operator? ☒ Yes ☐ No ☐ NA

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (264.76) (265.76)

☐ Yes ☐ No ☒ NA

a. If yes, has he submitted an unmanifested waste report to the Executive Director?

☐ Yes ☐ No ☒ NA

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility?
(264.53) (265.53)

☒ Yes ☐ No ☐ NA

a. If yes, is it a revised SPCC Plan?

☐ Yes ☒ No ☐ NA

b. Does contingency plan include: (264.52) (265.52)

1. Arrangements with local emergency response organizations?

☒ Yes ☐ No ☐ NA

2. Emergency coordinator's names, phone numbers and addresses?

☒ Yes ☐ No ☐ NA

3. List of all emergency equipment at facility and descriptions of equipment?

☒ Yes ☐ No ☐ NA

4. Evacuation plan for facility personnel?

☒ Yes ☐ No ☐ NA

2. Is there an emergency coordinator on site or on call at all times? (264.55) (265.55)

☒ Yes ☐ No ☐ NA

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? (264.71) (265.71)

☐ Yes ☒ No ☐ NA

a. If yes, does the owner/operator retain copies of all manifests?

☐ Yes ☐ No ☒ NA

1. Are the manifests signed and dated and returned to the generator?

☐ Yes ☐ No ☒ NA

2. Is a signed copy given to the transporter?

☐ Yes ☐ No ☒ NA

2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71)

☐ Yes ☒ No ☐ NA

a. If yes, is it accompanied by a shipping paper?

☐ Yes ☐ No ☒ NA

1. Does the owner/operator sign and date the shipping paper and return a copy to the generator?

☐ Yes ☐ No ☒ NA

2. Is a signed copy given to the transporter?

☐ Yes ☐ No ☒ NA

3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72)

☐ Yes ☐ No ☒ NA

a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter?

☐ Yes ☐ No ☒ NA

1. If no, has Regional Administrator been notified?

☐ Yes ☐ No ☒ NA

2. Is the facility equipped with: (264.32) (265.32)
- a. Internal communication or alarm system? ☒ Yes ☐ No ☐ NA
 - 1. Is it easily accessible in case of emergency? ☒ Yes ☐ No ☐ NA
 - b. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No ☐ NA
 - c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? ☒ Yes ☐ No ☐ NA
 - d. Water of adequate volume of hoses, sprinklers, or water spray system? ☒ Yes ☐ No ☐ NA
 - 1. Describe source of water CITY OF COLUMBUS
3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35) (265.35) ☒ Yes ☐ No ☐ NA
4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (264.37) (265.37) ☒ Yes ☐ No ☐ NA
5. In the case that more than one police or fire department might respond, is there a designated primary authority? (264.37) (265.37) ☐ Yes ☐ No ☒ NA
- a. If yes, name primary authority _____
6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? (264.37) (265.37) ☒ Yes ☐ No ☐ NA
- a. Are they really available to all personnel? ☒ Yes ☐ No ☐ NA
7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (264.37) (265.37) ☒ Yes ☐ No ☐ NA
8. If State or local authorities declined to enter into agreements, is this entered in the operating record? (264.37) (265.37) ☐ Yes ☐ No ☒ NA

How long are they kept? INDEFINITE

a. If yes, do they include:

1. Job title and written job description of each position? ☒ Yes ☐ No ☐ NA
2. Description of type and amount of training? ☒ Yes ☐ No ☐ NA
3. Records of training given to facility personnel? ☒ Yes ☐ No ☐ NA

Requirements for Ignitable, Reactive, or Incompatible Waste
(264.17) (265.17)

8. Does facility handle ignitable or reactive wastes? ☐ Yes ☒ No ☐ NA

- a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?
 1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
 2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

- b. Are smoking and open flames confined to specifically designated locations? ☐ Yes ☐ No ☒ NA
- c. Are "No Smoking" signs posted in hazardous areas? ☐ Yes ☐ No ☒ NA
- d. Are precautions documented (Part 264 only)? ☐ Yes ☐ No ☒ NA

9. Check containers

- a. Are containers leaking or corroding? ☐ Yes ☐ No ☒ NA
- b. Is there evidence of heat generation from incompatible wastes? ☐ Yes ☐ No ☒ NA

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31) ☐ Yes ☒ No ☐ NA

If yes, use narrative explanation sheet to explain.

7. Does the facility submit to the Executive Director reports on releases, fires, and explosions; contamination and monitoring data; and facility closure?

☒ Yes ☐ No ☐ NA

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? ☒ Yes ☐ No ☐ NA

If yes, complete a through e.

a. 1. Did generator sign and date all manifests? ☒ Yes ☐ No ☐ NA
2. Who signed for generator? ☒ Yes ☐ No ☐ NA

Name Charles Swann Title _____

b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ☒ Yes ☐ No ☐ NA
2. Who signed and dated for transporter? ☒ Yes ☐ No ☐ NA

Name Various Title _____

c. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ☐ No ☐ NA
d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ☐ No ☐ NA
e. Does generator retain copies for 3 years? ☒ Yes ☐ No ☐ NA

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? (261.30) ☒ Yes ☐ No ☐ NA

a. If yes, list waste and quantities (include EPA Hazardous Waste No.) F034 Various

2. Does generator solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20) ☐ Yes ☐ No ☐ NA

a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) _____

2 PARTS WASH R
SOLVENT COULD
BE DOO

b. Does generator determine characteristics by testing or by applying knowledge of processes? PARTS WASHER ☒ Yes ☐ No ☐ NA

APPARENTLY HAS NOT BEEN TESTED

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☐ Yes ☐ No ☐ NA

Part _____

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No.? (262.12) ☒ Yes ☐ No ☐ NA
- a. If yes, EPA I.D. No. 920866329

Section B - Manifest

1. Does generator ship waste offsite? (262.20) ☒ Yes ☐ No ☐ NA
- a. If no, do not fill out Sections B and D.
- b. If yes, identify primary offsite facility(s).
Chem waste
2. Does generator use manifest? (262.20) ☒ Yes ☐ No ☐ NA
- a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)? ☐ Yes ☐ No ☒ NA
1. If yes, does generator indicate this when sending waste to a TSD facility? ☐ Yes ☐ No ☒ NA
- b. If yes, does manifest include the following information? ☐ Yes ☐ No ☐ NA
1. Manifest document No. ☒ Yes ☐ No ☐ NA
2. Generator's name, mailing address, telephone number ☒ Yes ☐ No ☐ NA
3. Generator EPA I.D. No. ☒ Yes ☐ No ☐ NA
4. Transporter Name(s) and EPA I.D. No.(s) ☒ Yes ☐ No ☐ NA
5. a. Facility name, address, and EPA I.D. No. ☒ Yes ☐ No ☐ NA
- b. Alternate facility name, address, and EPA I.D. No. ☒ Yes ☐ No ☐ NA
- c. Instructions to return to generator if undeliverable ☒ Yes ☐ No ☐ NA
6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number) ☒ Yes ☐ No ☐ NA
7. Emergency information (optional) (special handling instructions, telephone No.) ☒ Yes ☐ No ☐ NA
8. Is the following certification on each manifest form? ☒ Yes ☐ No ☐ NA

7. Accumulation time: (262.34)

- a. Are containers used to temporarily store waste before transport? ☒ Yes ☐ No ☐ NA
1. If yes, is each container clearly dated:
Also, fill out rest of No. 7 (accum. time) ☒ Yes ☐ No ☐ NA
- b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ☒ Yes ☐ No ☐ NA
2. If yes, with what frequency? Weekly ☐ Yes ☐ No ☐ NA
- c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) ☐ Yes ☐ No ☒ NA

NOTE: If tanks are used, fill out checklist for tanks.

- d. Are the containers labeled and marked in accordance with Section D-3, D-4, and D-5 of this form? ☐ Yes ☐ No ☒ NA

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

- e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) ☐ Yes ☐ No ☐ NA

8. Describe storage area. Use photos and narrative explanation sheet. Row off boxes placed on Drip PAD.

Section E - Recordkeeping and Records (262.40)

1. Does generator keep the following reports for 3 years?

- a. Manifests and signed copies from ☒ Yes ☐ No ☐ NA
- b. ~~Annual~~ Biennial Reports ☒ Yes ☐ No ☐ NA
- c. Exception reports ☒ Yes ☐ No ☐ NA
- d. Test results ☒ Yes ☐ No ☐ NA

2. Where are the records kept (at facility or elsewhere)?

Facility

3. Who is in charge of keeping the records?

Name Toni Harris Title Plant MGR

a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators?

☒ Yes ☒ No ☐ NA

a. If yes, did generator test all wastes to determine nonhazardous characteristics?

☒ Yes ☐ No ☐ NA

1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).

SCRAP ENDS FROM TREATED TIES WERE TESTED FOR
TEHP. THIS WASTE HAS BEEN DETERMINED BY EPA
NAT TO HAZARDOUS TIE F034.

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30)

☒ Yes ☐ No ☐ NA

2. a. Are containers to be shipped leaking or corroding?
b. Use sheet to describe containers and condition.

☐ Yes ☒ No ☐ NA

c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31)

☐ Yes ☒ No ☐ NA

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

4. Does generator mark each package in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

5. Is each container of 110 gallons or less marked with the following label? (262.32)

☐ Yes ☐ No ☒ NA

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

Manifest document No. _____

6. Does generator have placards to offer to transporters? (262.33)

☒ Yes ☐ No ☐ NA

Section F - Special Conditions

1. Has generator received from or transported to a foreign Administrator? ☐ Yes ☒ No ☐ NA
- a. If yes, has he filed a notice with the Regional Administrator? ☐ Yes ☐ No ☒ NA
- b. Is this waste manifested and signed by a foreign cosignee? ☐ Yes ☐ No ☒ NA
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? ☐ Yes ☐ No ☒ NA

Part ____

CONTAINERS CHECKLIST

Section A - Use and Management (264.171) (265.171)

1. Are containers in good condition?

☒ Yes ___ No ___ NA

Section B - Compatibility of Waste With Container (264.172)

1. Is container made of a material that will not react with the waste which it stores?

☒ Yes ___ No ___ NA

Section C - Management of Containers (264.173) (265.173)

1. Is container always closed while holding hazardous waste?

Roll-off Box has cover

☒ Yes ___ No ___ NA

2. Is container handled so that it will not be opened, handled, or stored in a manner which may rupture it or cause it to leak?

☒ Yes ___ No ___ NA

Section D - Inspections (264.174) (265.174)

1. Does owner/operator inspect containers at least weekly for leaks and deterioration?

☒ Yes ___ No ___ NA

Section E - Containment (Part 264) (264.175)

1. Do container storage areas have a containment system?

☒ Yes ___ No ☒ NA

- a. Is the base free of cracks or gaps?

___ Yes ___ No ☒ NA

- b. Is the base sloped or otherwise designed to drain and remove liquids?

___ Yes ___ No ☒ NA

- c. Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container?

___ Yes ___ No ☒ NA

- d. Is any method available to prevent run-on into the containment system?

___ Yes ___ No ☒ NA

- e. Is spilled or leaked material or accumulated precipitation removed from the containment area in a timely manner?

___ Yes ___ No ☒ NA

Section F - Ignitable and Reactive Waste (264.176) (265.176)

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines?

☒ Yes ☐ No ☒ NA

Section G - Incompatible Waste (264.177) (265.177)

1. Are incompatible wastes or materials placed in the same containers?
2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?
3. Are incompatible wastes separated from each other by a berm, dike, wall, or other device?

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

Section H - Closure (Part 264) (264.178)

1. At closure, were all hazardous wastes and associated residues removed from the containment system?

☐ Yes ☐ No ☒ NA

Part _____

SURFACE IMPOUNDMENTS CHECKLIST

Section A - Design Requirements (264.221) (265.221)

1. Does facility operate one or more surface impoundments? ☐ Yes ☒ No ☐ NA

a. If yes, has owner/operator installed two or more liners and a leachate collection system for any new units, replacement of any existing units, or lateral expansion of units? ☐ Yes ☐ No ☒ NA

b. Is owner/operator exempt from double-liner leachate collection system requirements because Regional Administrator has determined that impoundment's design will prevent the migration of hazardous constituents? ☐ Yes ☐ No ☒ NA

c. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)? ☐ Yes ☐ No ☒ NA

d. If impoundment does not have a double liner, is it exempt due to one of the following reasons? ☐ Yes ☐ No ☒ NA

1. Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand.

2. Monofill has at least one liner for which there is no evidence of leaking.

3. Monofill is located, designed, and operated to ensure that no migration of constituents into ground or surface water occurs.

e. Does owner/operator take measures to prevent overfilling; wind and wave action; rainfall; run-on; malfunctions of level controllers, alarms, and other equipment; and human error (Part 264)? ☐ Yes ☐ No ☒ NA

f. Is impoundment surrounded by dikes (Part 264)? ☐ Yes ☐ No ☒ NA

Section B - Operating Requirements

1. Does owner/operator maintain at least 60 cm (2 ft) of freeboard (Part 265)? (265.222)

2. Does owner/operator have certification from a qualified engineer that alternate design features will prevent overtopping? (Part 265) (265.222) ☐ Yes ☐ No ☒ NA

Section C - Containment Systems

1. Do all dikes have a protective cover such as grass, shale or rock? (Part 265) (265.223) ☐ Yes ☐ No ☒ NA

Section D - Waste Analysis and Trial Tests

1. Will the surface impoundment be used to: (265.225)
- a. Chemically treat a hazardous waste which is substantially different from wastes previously treated in the impoundment? (Part 265) ☐ Yes ☐ No ☒ NA
- b. Chemically treat hazardous waste with a substantially different process than any previously used in that impoundment? ☐ Yes ☐ No ☒ NA
2. If the answer in #1 was yes to any questions, has the owner/operator:
- a. Conducted waste analysis or trial treatment tests? ☐ Yes ☐ No ☒ NA
- b. Obtained written, documented information on treatment of similar wastes under similar operating conditions? ☐ Yes ☐ No ☒ NA

Section E - Inspections and Monitoring

1. Does the owner/operator:
- a. Inspect the freeboard at least one each operating day? (265.226) ☐ Yes ☐ No ☒ NA
- b. Inspect the surface impoundment including dikes and vegetation at least once per week and after storms? (264.226) (265.226) ☐ Yes ☐ No ☒ NA
2. Have any deteriorations or malfunctions that have been found been remediated? ☐ Yes ☐ No ☒ NA
3. Has the owner/operator obtained a certification from a qualified engineer that the impoundments dike has structural integrity? (264.226) ☐ Yes ☐ No ☒ NA

Section F - Emergency Repairs, Contingency Plans (Part 264) (264.227)

1. Does facility have a contingency plan? ☒ Yes ☐ No ☐ NA
- a. If yes, does plan stipulate that impoundment be removed from service under the following conditions:
1. Sudden drop in liquid level? ☐ Yes ☐ No ☒ NA

2. Leaking dike?

☐ Yes ☐ No ☒ NA

b. Does plan detail the steps to be followed when removing impoundment from service, including:

1. Shutting off flow into impoundment?

☐ Yes ☐ No ☒ NA

2. Containing any surface leakage?

☐ Yes ☐ No ☒ NA

3. Stopping the leak?

☐ Yes ☐ No ☒ NA

4. Notifying Regional Administrator of problems in writing if leaks cannot be contained?

☐ Yes ☐ No ☒ NA

c. If impoundment was removed from service, did owner/operator take the necessary precautions to rectify problems before restoring impoundment to service?

☐ Yes ☐ No ☒ NA

d. If impoundment was removed from service and was not restored to service, was impoundment closed in accordance with an approved closure plan?

☐ Yes ☐ No ☒ NA

Section G - Closure and Post-Closure (264.228) (265.228)

1. Is a closure plan retained at the facility?

☒ Yes ☐ No ☐ NA

2. At closure, did owner/operator:

a. Remove standing liquids (Part 265)?

☒ Yes ☐ No ☐ NA

b. Remove waste and waste residue (Part 265)?

☐ Yes ☒ No ☐ NA

c. Remove liner (Part 265)?

☐ Yes ☐ No ☒ NA

d. Remove underlying and surrounding contaminated soil?

☐ Yes ☐ No ☐ NA

e. If not, did owner/operator demonstrate to Regional Administrator that the above materials were non-hazardous (Part 265)?

☐ Yes ☐ No ☐ NA

1. If no, has owner/operator closed the impoundment and provided post-closure care (Part 265)?

☒ Yes ☐ No ☐ NA

3. If regulated under Part 264, has owner/operator: (264.228)

a. Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment, and managed them as hazardous waste?

☒ Yes ☐ No ☐ NA

b. Eliminated free liquids by removing or solidifying remaining wastes or waste residues?

☒ Yes ☐ No ☐ NA

c. Stabilized remaining wastes to a bearing capacity sufficient to support final cover?

☒ Yes ☐ No ☐ NA

d. Covered the impoundment with final cover?

☒ Yes ☐ No ☐ NA

4. Did owner/operator leave any residuals in place at closure (Part 264)? (264.228)

☒ Yes ☐ No ☐ NA

5. In post-closure, does owner/operator maintain integrity of cover and groundwater monitoring system, and prevent runoff and runoff? (264.228) (265.228)

☒ Yes ☐ No ☐ NA

Section H - Ignitable and Reactive Wastes (264.229) (265.229)

1. Are ignitable or reactive wastes placed in the impoundment?

☐ Yes ☐ No ☒ NA

- a. If yes, are they treated, rendered, or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive?

☐ Yes ☐ No ☒ NA

OR

- b. Is the impoundment used solely for emergencies?

☐ Yes ☐ No ☒ NA

Section I - Incompatible Wastes

(264.230) (265.230)

1. Are incompatible wastes placed in the impoundment?

☐ Yes ☐ No ☒ NA

(To be filled out for each hazardous waste)

Waste Code:

5-1-1954

Knowledge of Waste. Describe.

100

1957

[illegible]

Waste Information Worksheet
(To be filled out for each hazardous waste)

Waste Name: Contaminated Soils & Debris
Waste Code: F034, D021
Process Generating Waste: Cleanup of past practices

How was determination made?
☒ Knowledge of Waste. Describe. _____
☐ Testing. Describe. _____

Waste Generation Rate (may be estimated) Varies 39.9 tons 1993

Disposal Procedure: Land Disposal

Site/Firm: Chem Waste

Is waste subject to requirements of MHWMR 268? Yes ☐ No ☒
Describe. _____

Is waste excluded under MHWMR 261.4? Yes ☐ No ☒
Describe. _____

Appendix I - Satellite Accumulation Area

1. Source/Area: Tire Storage

2. Type waste: Foam

3. Condition of Containers: GOOD

a. Containers closed?

☒ Yes ☐ No ☐ NA

b. Containers properly labeled?

☒ Yes ☐ No ☐ NA

4. If > 55 gallons accumulated, has generator complied with 262.34(c)(2)?

☐ Yes ☐ No ☒ NA

Part ____

GROUNDWATER MONITORING CHECKLIST

Section A - Monitoring System

1. Does the facility have a groundwater monitoring system in operation? ☒ Yes ☐ No ☐ NA
- a. If yes, does the system consist of: (265.91)(264.97)
1. At least one upgradient/background well? ☒ Yes ☐ No ☐ NA
2. At least three downgradient wells? ☒ Yes ☐ No ☐ NA
- b. Are wells identified in the field? *Markings labeled* ☒ Yes ☐ No ☐ NA
- c. Are well heads in good condition (i.e. free of cracks)? ☒ Yes ☐ No ☐ NA
- d. Are well heads locked? ☒ Yes ☐ No ☐ NA
- e. Do well heads have bumper guards or are otherwise protected? *Some have bumper guards* ☐ Yes ☐ No ☐ NA

Section B - Sampling and Analysis (Part 264)

1. Does the facility obtain and analyze samples from the groundwater monitoring system? ☒ Yes ☐ No ☐ NA
2. Has facility developed and followed a groundwater sampling and analysis plan? (264.97(d)) ☒ Yes ☐ No ☐ NA
- a. If yes, does this plan include procedures and techniques for:
1. Sample collection? ☒ Yes ☐ No ☐ NA
2. Sample preservation? ☒ Yes ☐ No ☐ NA
3. Analytical procedures? ☒ Yes ☐ No ☐ NA
4. Chain-of-custody control? ☒ Yes ☐ No ☐ NA
5. Determining the groundwater surface elevation? ☒ Yes ☐ No ☐ NA
3. Has facility specified a statistical method to be used in evaluating groundwater monitoring data? ☐ Yes ☒ No ☐ NA
4. Is all groundwater monitoring data recorded in the operating record? ☒ Yes ☐ No ☐ NA

Section C - Detection Monitoring Program (264.98)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases?

☒ Yes ☐ No ☒ NA

- a. If yes, are the following components included in the system:

1. Background values?
2. Determination of groundwater flow rate and direction annually? (264.98(e))
3. Determination of statistically significant increases over background concentrations at each well? (264.98(f))
4. If there was a statistically significant increase indicated, did the facility notify the Executive Director per 264.98(g)(1)?
5. Did facility attempt to demonstrate an apparent increase was not caused by a regulated unit per MHWMR 264.98(g)(6)?
6. Is all information contained in the facility's operating record?

☒ Yes ☐ No ☒ NA
☒ Yes ☐ No ☒ NA
☐ Yes ☐ No ☒ NA
☐ Yes ☐ No ☒ NA
☐ Yes ☒ No ☒ NA
☒ Yes ☐ No ☒ NA

Section D - Compliance Monitoring Program (264.99)

1. Does the facility operate a compliance monitoring program?

☒ Yes ☐ No ☐ NA

- a. If yes, does the facility:

1. Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e))
2. Collect at least four samples from each well at least semi-annually? (264.99(f))
3. Determine whether there is statistically significant evidence of increased contamination at each monitoring well?
4. If an increase was indicated, did facility notify the Executive Director?
5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually?
6. Record all information in the operating record?

☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☒ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA

Section E - Corrective Action Program (Part 264 only) (264.100)

1. Does facility follow a corrective action program that meets the facility's permit requirements?

☒ Yes ☐ No ☐ NA

Section F - Sampling and Analysis (Part 265)

1. Has the facility developed and followed a groundwater sampling and analysis plan?

~~Yes~~ _ No NA

a. If yes, does the plan include procedures and techniques for:

1. Sample collection?
2. Sample preservation?
3. Analytical procedure?
4. Chain-of-custody control?

~~Yes~~ _ No NA
~~Yes~~ _ No NA
~~Yes~~ _ No NA
~~Yes~~ _ No NA

2. Has the owner/operator established initial background concentrations or values of all parameters specified in 265.92(b)?

~~Yes~~ _ No NA

a. Samples collected to establish background quality (from above)?

~~Yes~~ _ No NA

b. Samples collected to indicate contamination (from above)?

~~Yes~~ _ No NA

c. Elevation of groundwater surface at each monitoring well at each sampling event?

~~Yes~~ _ No NA

Section G - Preparation, Evaluation, and Response (Part 265 only) (265.93)

1. Did owner/operator prepare an outline of a groundwater quality assessment program?

~~Yes~~ _ No NA

a. If yes, did program determine the following:

1. Whether hazardous waste or hazardous waste constituents have entered the groundwater?

~~Yes~~ _ No NA

2. Rate and extent of hazardous waste or hazardous waste constituent migration?

~~Yes~~ _ No NA

3. Concentrations of hazardous waste or hazardous waste constituents in groundwater?

~~Yes~~ _ No NA

b. For each well, has owner/operator calculated the arithmetic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean?

_ Yes NA No NA

c. Has owner/operator submitted information documenting any significant increase in comparisons for up-gradient wells (or decrease in pH)?

_ Yes _ No NA

d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional groundwater samples from

those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error)

__Yes __No NA

1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days?

__Yes __No NA

2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Executive Director within 15 days after notification (discussed above) a certified groundwater quality assessment program?

__Yes __No NA

3. Did owner/operator implement the groundwater quality assessment program and, at a minimum, did he determine the following:

__Yes __No NA

- a. Rate and extent of migration of the hazardous waste constituents in the groundwater?

__Yes __No NA

- b. Concentrations of the hazardous waste in the groundwater?

__Yes __No NA

4. Did owner/operator submit a report to the Executive Director containing the requests of the assessment outlined in No. 3 above within 15 days?

__Yes __No NA

5. Did owner/operator notify the Executive Director of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the groundwater?

__Yes __No NA

6. If owner/operator determined that hazardous waste or hazardous waste constituents entered the groundwater, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or groundwater quality assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if groundwater quality assessment plan was implemented during post-closure?

__Yes __No NA

7. If any groundwater quality assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed program and reported to the Executive Director, as outlined in No. 4 above?

__Yes __No NA

8. If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on groundwater elevation

obtained under No. 3c in Section F above to determine whether the requirements for locating monitoring wells are satisfied?

☐ Yes ☒ No ☒ NA

- a. If evaluation shows that the requirements for monitoring wells are not satisfied, has owner/operator modified the number, location, or depth of the monitoring wells to bring the system into compliance?

☐ Yes ☒ No ☒ NA

Section H - Recordkeeping and Reporting (Part 265 only) (265.94)

1. Unless owner/operator is monitoring to satisfy the requirements of Section 265.93(d)(4), does owner/operator:

- a. Keep records of the analyses required in Section 265.92(c) and (d), groundwater surface elevations required in 265.93(b) throughout the active life of the facility and throughout post-closure?
- b. Report the following information to the Executive Director:

☒ Yes ☐ No ☐ NA

1. Within 15 days of analysis for each quarterly sampling event, does owner/operator submit results of background concentrations?
2. Does owner/operator inform the Executive Director about any parameters that exceed maximum contaminant levels listed in Appendix III?
3. (Annually) does owner/operator report concentrations or values of parameters listed in Section 265.92(b)(3) for each well, including required evaluation for these parameters under Section 265.93(b)?

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

- a. Does owner/operator also identify differences from initial background concentrations found in the upgradient wells no later than March 1 following each calendar year?

☒ Yes ☐ No ☐ NA

2. Does owner/operator submit results of the groundwater surface elevations under Section 265.93(f), along with a description of the response, if needed?

☐ Yes ☐ No ☒ NA

3. If groundwater is monitored to satisfy requirements of Section 265.93(d)(4), did owner/operator do the following:

a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure?

__Yes __No ☒ NA

b. (Annually, until final closure) submit to the Regional Administrator a report containing the results of the groundwater quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1?

__Yes __No ☒ NA

Part _____

FINANCIAL REQUIREMENTS CHECKLIST

Section A - Closure

1. Is facility required to provide financial assurance for closure? Yes No NA
- a. Type of financial assurance Financial
- b. Amount of closure costs _____
1. Date of most recent adjustment _____
- c. Effective date of mechanism _____
- d. Expiration date of mechanism _____
- e. Is instrument adequate? Yes No NA

Section B - Post-Closure

1. Is facility required to provide financial assurance for post-closure care? XYes No NA
- a. Type of financial assurance Financial TEST
- b. Amount of closure costs \$452,000
1. Date of most recent adjustment March 1994
- c. Effective date of mechanism March 1994
- d. Expiration date of mechanism March 1995
- e. Is instrument adequate? XYes No NA

Section C - Corrective Action

1. Is facility required to provide financial assurance for corrective action? XYes No NA
- a. Type of financial assurance Financial TEST
- b. Amount of closure costs 127,000
1. Date of most recent adjustment March 1994
- c. Effective date of mechanism March 1994
- d. Expiration date of mechanism March 1995
- e. Is instrument adequate? XYes No NA

Section D - Liability Requirements

1. Is facility required to provide liability coverage for sudden accidental occurrences? XYes No NA
- a. Type of assurance Financial TEST
- b. Is amount at least \$1 million per occurrence, \$2 million annual aggregate? XYes No NA
- c. Effective date of mechanism March 1994

d. Expiration date of mechanism March 1995

2. Is facility required to provide liability coverage for non-sudden accidental occurrences?

☒ Yes ☐ No ☐ NA

- a. Type of assurance Financial Trust
b. Is amount at least \$3 million per occurrence, \$6 million annual aggregate?
c. Effective date of mechanism March 1994
d. Expiration date of mechanism March 1995

☒ Yes ☐ No ☐ NA

CHECKLIST:lr

1. Does the owner operator maintain a contingency plan for the management of infrequent and incidental spills?

yes no

Does the plan at a minimum describe how the facility will do the following:

- a. Clean up the drippage?
- b. Document the cleanup?
- c. Retain documents for three years?
- d. Manage the contaminated media consistent with regulations?

~~yes~~ no
~~yes~~ no
~~yes~~ no

~~yes~~ no

1988

2. When was the drip pad constructed?

3. For drip pads constructed before December 6, 1990, does the owner operator maintain a written assessment of the drip pad certified by a qualified registered professional engineer?

~~yes~~ no

- a. Is the assessment recertified annually?

~~yes~~ no

4. Is the drip pad constructed of non-earthen material with the exception of wood and non-structurally supported asphalt?

~~yes~~ no

5. Is the drip pad sloped to free-drain drippage and precipitation?

~~yes~~ no

6. Does the drip pad have a curb or berm around the perimeter?

~~yes~~ no

7. Does the drip pad have a hydraulic conductivity of 10^{-7} cm/s or less or have a coating with a hydraulic conductivity of 10^{-7} cm/s or less? (If yes go to 11)

~~yes~~ no

8. Is there a synthetic liner below the drip pad?

yes no NA

9. Is there a leakage detection system immediately above the liner?

yes no NA

10. Is there a leakage detection system immediately above the liner?

yes no NA

- a. Is the date, time, and quantity of any leakage removal documented in the operating log?

yes no NA

11. Is the drip pad free of cracks, gaps and corrosion?

~~yes~~ no

12. Does the operator maintain a run-on control system?

~~yes~~ no

13. Does the operator maintain a run-off control system capable of handling a 25 year 24 hour storm event?

yes no

14. At what frequency is drippage and accumulated precipitation removed from the pad?

daily

15. At what frequency is the drip pad cleaned?

daily

16. Is the cleaning and cleaning procedure documented?

yes no

17. Is the drip pad inspected weekly?

yes no

18. Are treatment vessels held on the pad until dripping has ceased?

yes no

19. Are collection units associated with run-on/run-off control emptied or otherwise managed as soon as possible after storm events?

yes no

Compliance Evaluation Inspection

Kerr-McGee Chemical Corporation

Columbus, Mississippi

August 1997

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
RCRA INSPECTION REPORT
COMPLIANCE EVALUATION INSPECTION
KERR-McGEE CHEMICAL CORPORATION
COLUMBUS, MISSISSIPPI**

1. Inspector and Author of Report

Bruce Ferguson, EEII
Mississippi Office of Pollution Control (MOPC)

2. Facility Information

Kerr-McGee Chemical Corporation (KMCC)
Forest Products Division
P. O. Box 906
Columbus, Mississippi 39701
MSD990866329

3. Responsible company Official

Chuck Swann, KMCC

4. Inspection Participants

Steve Ladner, KMCC
James Taylor, KMCC
Bruce Ferguson, MOPC

5. Date and Time of Inspection

August 26, 1997 @ 10:00 a.m.

6. Applicable Requirements

Mississippi Hazardous Waste Management Regulations (MHWMR) Parts 262, 264, 265, 268 and 279 and the facility's Hazardous Waste Post-Closure Permit No. HW-90-139-01.

7. Facility Description

The site now occupied by Kerr-McGee Chemical Corporation has been used as a wood treating facility since 1928. KMCC acquired the site in 1964 and continued to produce treated railroad ties, switch ties, crossings, and pilings using creosote as a preservative. Pentachlorophenol was also used as a preservative prior to 1976.

The facility is permitted to conduct post-closure and groundwater corrective action activities. In June of 1986, KMCC certified closure of two hazardous waste surface impoundments, an aeration basin and a sedimentation basin in which bottom sediment sludge from process wastewater accumulated. The surface impoundments were replaced by upgrading production process oil/water separators to recycle preservatives for re-application within the production process. The wastewater is then pumped to the wastewater treatment system which operates under a pre-treatment permit and is discharged to the City of Columbus POTW.

Presently, the groundwater corrective action system consists of 13 groundwater recovery wells and two recovery trenches. Recovered groundwater is pumped to an above ground oil-water separator with a capacity of 35,000 gallons. After the separation process, the wastewater is sent through the facility wastewater treatment system and discharged to the POTW. During periods of heavy rains and subsequent high groundwater recovery rates, the facility uses a tank for storage of groundwater. This storage of groundwater is sometimes necessary to prevent exceeding the POTW discharge rates.

In 1988, KMCC installed a concrete drip track to collect excess preservative drippage from treated wood after removal from the pressure cylinder. In December of 1991, the drip track was certified by a professional engineer that the track met the requirements of 40 CFR 264.571. The drip pad operates under Part 265 Subpart W regulations.

The facility has two black tie storage areas. The smaller of the two areas is located north of 14th Avenue and the larger area is located south of 14th Avenue. A contingency plan is maintained at the facility for the remediation of incidental spills and drippage and these areas are therefore not subject to Part 265 Subpart W regulations.

The facility maintains two less than 90 day container storage areas. One area consists of a roll off box which is maintained on a concrete pad by the facility's drip pad used to collect contaminated soil and debris. The second less than 90 day container storage area is used to store drums. This area is located west of the process area.

9. Findings

The closed surface impoundments were inspected and found to be in good condition. The closed impoundment can be seen in Photograph 1. The facility maintains documentation of the required inspection of the surface impoundment. The past year's inspection documentation was reviewed and found to be in order. The closed unit is inspected weekly.

The black tie storage yard appeared to be in good condition with no remarkable signs of incidental drippage. The facility maintains a contingency plan for the cleanup of incidental drippage. Inspection of the storage yard is conducted daily and documented.

The drip pad can be seen in Photograph 2. The pad appeared to be in good condition with no notable signs of cracks or gaps. The drip pad is inspected on a weekly basis. The documentation for the past year was reviewed and appeared to be in order. The facility also maintains documentation of the cleaning of the drip pad. The past years cleaning documentation was reviewed and appeared in order. The facility obtains a written assessment of the drip pad from a registered professional engineer annually. This assessment was last conducted on December 20, 1996.

Treated wood is held on the drip pad until dripping has ceased. The facility maintains records of the time that specific charges are held on the drip pad. Charges pulled during the day are held on the drip pad from ½ to 1 ½ hours. If the charge is pulled near the end of the second shift, the charge is left on the drip pad overnight. Charges were being removed from the drip pad during the inspection and no dripping from the charge was observed.

The facility's less than 90 day storage areas can be seen in Photographs 3 and 4. All containers were properly labeled as hazardous waste and contained an accumulation date within the allowed 90 days. The container is located on a pad adjacent the facility's drip pad. Weekly inspections of the container storage area are conducted and documented. The facility began maintaining two container storage areas in order to segregate the F034 contaminated soil and debris from the F034 waste which is prohibited from land disposal.

The hazardous waste manifests were reviewed and found to contain the proper information. Each manifest was signed by the generator and transporter and return copies were attached signed by the disposal facility.

An operations training manual is maintained at the facility. The manual is divided into numbered sections of various types of training required. Each position at the facility is listed in the manual with the required training sections to be covered. The training records are maintained on a computer. The most recent training related to RCRA was conducted on March 11, 1997.

Financial assurance for corrective action, post-closure activities and liability is provided through the use of a financial test. The financial assurance was submitted to the MOPC in March of 1997 and was found to meet the regulatory requirements.

10. **Conclusions**

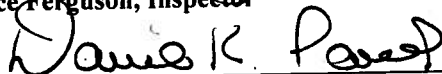
The facility was found to be in compliance with the applicable regulations and the Post-Closure permit.

11. **Signatures**



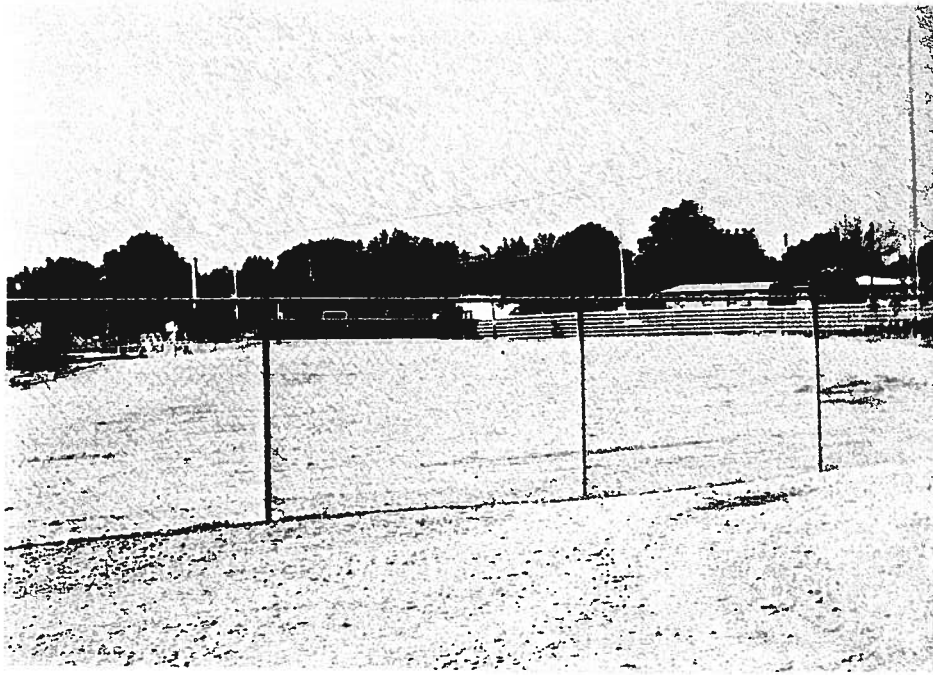
Bruce Ferguson, Inspector

9/12/97
Date

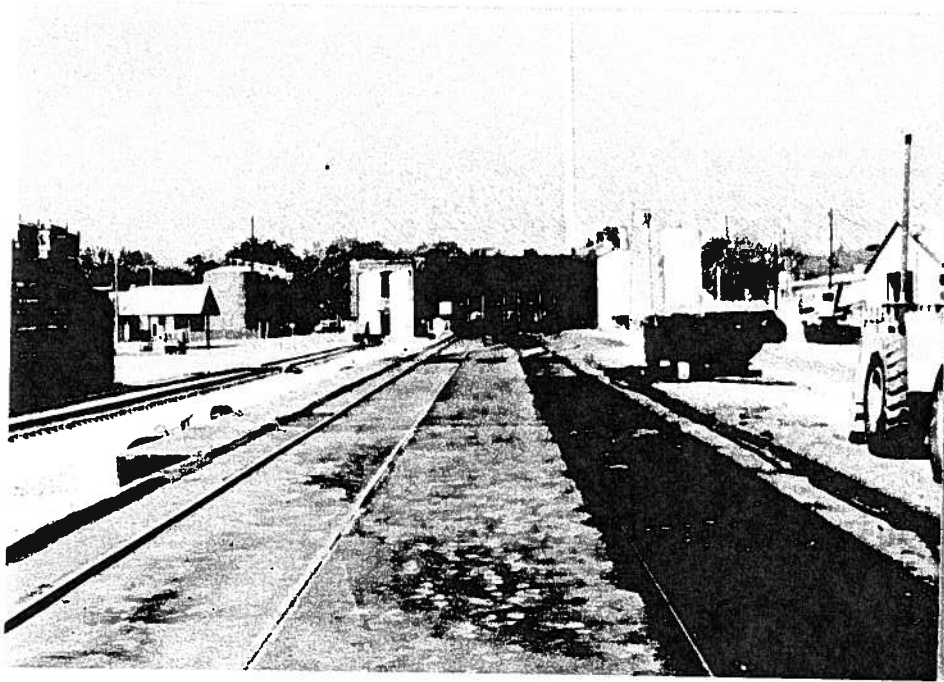


David Peacock, Supervisor

9/22/97
Date



Photograph 1 - Closed surface impoundments.



Photograph 2 - Drip pad.



Photograph 1 - Closed surface impoundments.



Photograph 2 - Drip pad.



Photograph 3 - Less than 90 day storage for contaminated soil and debris.



Photograph 4 - Less than 90 day drum storage area.

Compliance Evaluation
Inspection
Checklists

Table of Contents

General Site Inspection Form
General Facility Checklist
Land Disposal Restrictions Checklist
Generator Checklist
Transporter Checklist
Container Checklist
Tanks Checklist
Surface Impoundment Checklist
Waste Piles Checklist
Land Treatment Checklist
Landfills Checklist
Incinerators Checklist
Groundwater Monitoring Checklist
Financial Requirements
List of Appendices

Part 1

General Site Information

Facility Name: Warr-Melroe Chemical Corporation
Address: _____

I.D. Number: MSD 990 860 329
Contact: Steve Ladner
Title: _____
Phone Number: 405-270-2625

Type of Ownership:

___ Federal ___ State ___ County ___ Municipal ☒ Private

Facility Status:

☒ Generator ___ Transporter ___ Treatment ___ Storage ☒ Disposal

Regulatory Status:

___ Interim Status ___ Part B Submitted
☒ Permitted ___ Part B in Preparation

Principal Inspector Name: Bruce Ferguson Title: ERT
Organization: MDER Phone Number: 601-961-5141

Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Representing</u>
<u>Steve Ladner</u>		<u>Kmcc</u>
<u>James Taylor</u>		<u>Kmcc</u>
<u>Bruce Ferguson</u>		<u>MDER</u>

Part ____

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? ☒ Yes ☐ No ☐ NA

a. If yes, EPA I.D. No. _____
If no, explain. _____

2. Has facility received hazardous waste from a foreign source? ☐ Yes ☒ No ☐ NA

a. If yes, has it filed a notice with the Regional Administrator? ☐ Yes ☐ No ☒ NA

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ☒ Yes ☐ No ☐ NA

a. If yes, does it include: (264.13) (265.13)

1. Parameters for which each waste will be analyzed? ☒ Yes ☐ No ☐ NA

2. Test methods used to test for these parameters? ☒ Yes ☐ No ☐ NA

3. Sampling method used to obtain sample? ☒ Yes ☐ No ☐ NA

4. Frequency with which the initial analyses will be reviewed or repeated? ☒ Yes ☐ No ☐ NA

5. (For offsite facilities) waste analyses that generators have agreed to supply? ☐ Yes ☐ No ☒ NA

6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:

a. Procedures to be used to determine the identity of each movement of waste. ☐ Yes ☐ No ☒ NA

b. Sampling method to be used to obtain representative sample of the waste to be identified. ☐ Yes ☐ No ☒ NA

4. Does the facility provide adequate security through: (264.14) (265.14)

a. 24-hour surveillance system (e.g., television monitoring or guards)? ☐ Yes ☐ No ☐ NA

OR

- b. 1. Artificial or natural barrier around facility
(e.g., fence or fence and cliff)?

☒ Yes ☐ No ☐ NA

Describe fence

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)?

☐ Yes ☐ No ☐ NA

Describe _____

General Inspection Requirements (264.15) (265.15)

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

- a. Monitoring equipment?
b. Safety and emergency equipment?
c. Security devices:
d. Operating and structural equipment?
e. Types of problems of equipment:

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

1. Malfunction
2. Operator error
3. Discharges

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

6. Does the owner/operator maintain an inspection log?

☐ Yes ☐ No ☐ NA

- a. If yes, does it include:

1. Date and time of inspection?
2. Name of inspector?
3. Notation of observations?
4. Date and nature of repairs or remedial action?
5. Identification of potential problems?

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

☐ Yes ☐ No ☐ NA

- b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.)

☐ Yes ☐ No ☐ NA

- c. Are records kept a minimum of three years?

☐ Yes ☐ No ☐ NA

Personnel Training (264.16) (265.16)

7. Does the owner/operator maintain personnel training records at the facility?

☒ Yes ☐ No ☐ NA

Date of most recent training: 3/11/97

How long are they kept? in duplicate

a. If yes, do they include:

1. Job title and written job description of each position? ☒ Yes ☐ No ☐ NA
2. Description of type and amount of training? ☒ Yes ☐ No ☐ NA
3. Records of training given to facility personnel? ☒ Yes ☐ No ☐ NA

Requirements for Ignitable, Reactive, or Incompatible Waste
(264.17) (265.17)

8. Does facility handle ignitable or reactive wastes? ☐ Yes ☒ No ☐ NA

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flames confined to specifically designated locations? ☐ Yes ☐ No ☐ NA

c. Are "No Smoking" signs posted in hazardous areas? ☐ Yes ☐ No ☐ NA

d. Are precautions documented (Part 264 only)? ☐ Yes ☐ No ☐ NA

9. Check containers

a. Are containers leaking or corroding? ☐ Yes ☒ No ☐ NA

b. Is there evidence of heat generation from incompatible wastes? ☐ Yes ☒ No ☐ NA

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31) ☐ Yes ☒ No ☐ NA

If yes, use narrative explanation sheet to explain.

2. Is the facility equipped with: (264.32) (265.32)

a. Internal communication or alarm system?

☒ Yes ___ No ___ NA

1. Is it easily accessible in case of emergency?

☒ Yes ___ No ___ NA

b. Telephone or two-way radio to call emergency response personnel?

☒ Yes ___ No ___ NA

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?

☒ Yes ___ No ___ NA

d. Water of adequate volume of hoses, sprinklers, or water spray system?

___ Yes ___ No ___ NA

1. Describe source of water _____

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35)(265.35)

___ Yes ___ No ___ NA

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.)

(264.37) (265.37)

☒ Yes ___ No ___ NA

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (264.37) (265.37)

___ Yes ___ No ___ NA

a. If yes, name primary authority _____

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? (264.37) (265.37)

___ Yes ___ No ___ NA

a. Are they readily available to all personnel?

___ Yes ___ No ___ NA

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (264.37) (265.37)

___ Yes ___ No ___ NA

8. If State or local authorities declined to enter into agreements, is this entered in the operating record? (264.37) (265.37)

___ Yes ___ No ___ NA

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? (264.53) (265.53) ☐ Yes ☐ No ☐ NA
- a. If yes, is it a revised SPCC Plan? ☐ Yes ☐ No ☐ NA
- b. Does contingency plan include: (264.52) (265.52)
1. Arrangements with local emergency response organizations? ☐ Yes ☐ No ☐ NA
2. Emergency coordinator's names, phone numbers and addresses? ☐ Yes ☐ No ☐ NA
3. List of all emergency equipment at facility and descriptions of equipment? ☐ Yes ☐ No ☐ NA
4. Evacuation plan for facility personnel? ☐ Yes ☐ No ☐ NA
2. Is there an emergency coordinator on site or on call at all times? (264.55) (265.55) ☐ Yes ☐ No ☐ NA

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, does the owner/operator retain copies of all manifests? ☐ Yes ☐ No ☒ NA
1. Are the manifests signed and dated and returned to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, is it accompanied by a shipping paper? ☐ Yes ☐ No ☒ NA
1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72) ☐ Yes ☒ No ☐ NA
- a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? ☐ Yes ☐ No ☒ NA
1. If no, has Regional Administrator been notified? ☐ Yes ☐ No ☒ NA

4. Does the owner/operator keep a written operating record at the facility? (264.73) (265.73)

☐ Yes ☐ No ☒ NA

a. If yes, does it include:

1. Description and quantity of each hazardous waste received? ☐ Yes ☐ No ☐ NA
2. Methods and dates of treatment, storage, and disposal? ☐ Yes ☐ No ☐ NA
3. Location and quantity of each hazardous waste at each location? ☐ Yes ☐ No ☐ NA
4. Cross-references to manifests/shipping papers? ☐ Yes ☐ No ☐ NA
5. Records and results of waste analyses? ☐ Yes ☐ No ☐ NA
6. Report of incidents involving implementation of the contingency plan? ☐ Yes ☐ No ☐ NA
7. Records and results of required inspections? ☐ Yes ☐ No ☐ NA
8. Monitoring, testing, and analytical data, for groundwater required by Subpart F? ☐ Yes ☐ No ☐ NA
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? ☐ Yes ☐ No ☐ NA
10. Notices of generators as specified in Section 264.12(b) (Part 264)? ☐ Yes ☐ No ☐ NA

b. Does facility have copy of permit on site?

☐ Yes ☐ No ☐ NA

5. Does the facility submit a ^{Annual} biennial report by March 1 every even-numbered year? (264.75) (265.75)

☒ Yes ☐ No ☐ NA

a. If yes, do reports contain the following information:

1. EPA I.D. number? ☒ Yes ☐ No ☐ NA
2. Date and year covered by report? ☒ Yes ☐ No ☐ NA
3. Description/quantity of hazardous waste? ☒ Yes ☐ No ☐ NA
4. Treatment, storage, and disposal methods? ☒ Yes ☐ No ☐ NA
5. Monitoring data under Section 265.94(a)(2) and (b)(2) (Part 265)? ☒ Yes ☐ No ☐ NA
6. Most recent closure and post-closure cost estimates? ☒ Yes ☐ No ☐ NA
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? ☒ Yes ☐ No ☐ NA
8. Certification signed by owner/operator? ☒ Yes ☐ No ☐ NA

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (264.76) (265.76)

☐ Yes ☒ No ☐ NA

a. If yes, has he submitted an unmanifested waste report to the Executive Director?

☐ Yes ☐ No ☒ NA

7. Does the facility submit to the Executive Director reports on releases, fires, and explosions; contamination and monitoring data; and facility closure?

☐ Yes ☐ No ☒ NA

Part _____

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No.? (262.12) ☒ Yes ___ No ___ NA
- a. If yes, EPA I.D. No. _____

Section B - Manifest

1. Does generator ship waste offsite? (262.20) ☒ Yes ___ No ___ NA
- a. If no, do not fill out Sections B and D.
- b. If yes, identify primary offsite facility(s).

2. Does generator use manifest? (262.20) ☒ Yes ___ No ___ NA
- a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)?
___ Yes ___ No ☒ NA
1. If yes, does generator indicate this when sending waste to a TSD facility?
___ Yes ___ No ☒ NA
- b. If yes, does manifest include the following information?
1. Manifest document No. ☒ Yes ___ No ___ NA
2. Generator's name, mailing address, telephone number ☒ Yes ___ No ___ NA
3. Generator EPA I.D. No. ☒ Yes ___ No ___ NA
4. Transporter Name(s) and EPA I.D. No.(s) ☒ Yes ___ No ___ NA
5. a. Facility name, address, and EPA I.D. No. ☒ Yes ___ No ___ NA
- b. Alternate facility name, address, and EPA I.D. No. ☒ Yes ___ No ___ NA
- c. Instructions to return to generator if undeliverable ☒ Yes ___ No ___ NA
6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number) ☒ Yes ___ No ___ NA
7. Emergency information (optional) (special handling instructions, telephone No.) ☒ Yes ___ No ___ NA
8. Is the following certification on each manifest form? ☒ Yes ___ No ___ NA

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? ☒ Yes ☐ No ☐ NA

If yes, complete a through e.

a. 1. Did generator sign and date all manifests? ☒ Yes ☐ No ☐ NA
2. Who signed for generator? ☐ Yes ☐ No ☐ NA

Name _____ Title _____

b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ☒ Yes ☐ No ☐ NA
2. Who signed and dated for transporter? ☐ Yes ☐ No ☐ NA

Name _____ Title _____

c. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ☐ No ☐ NA
d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ☐ No ☐ NA
e. Does generator retain copies for 3 years? ☒ Yes ☐ No ☐ NA

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? (261.30) ☒ Yes ☐ No ☐ NA

a. If yes, list waste and quantities (include EPA Hazardous Waste No.) F034 4001

2. Does generator solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20) ☐ Yes ☒ No ☐ NA

a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) _____

b. Does generator determine characteristics by testing or by applying knowledge of processes? _____

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☐ Yes ☐ No ☐ NA

a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators?

☐ Yes ☐ No ☐ NA

a. If yes, did generator test all wastes to determine nonhazardous characteristics?

☐ Yes ☐ No ☐ NA

1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30)

☒ Yes ☐ No ☐ NA

2. a. Are containers to be shipped leaking or corroding?

☐ Yes ☒ No ☐ NA

b. Use sheet to describe containers and condition.

c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31)

☐ Yes ☒ No ☐ NA

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

4. Does generator mark each package in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

5. Is each container of 110 gallons or less marked with the following label? (262.32)

☒ Yes ☐ No ☐ NA

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

Manifest document No. _____

6. Does generator have placards to offer to transporters? (262.33)

☐ Yes ☐ No ☐ NA

7. Accumulation time: (262.34)

- a. Are containers used to temporarily store waste before transport? ☒ Yes ☐ No ☐ NA
1. If yes, is each container clearly dated:
Also, fill out rest of No. 7 (accum. time) ☒ Yes ☐ No ☐ NA
- b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ☒ Yes ☐ No ☐ NA
2. If yes, with what frequency? *weekly* ☒ Yes ☐ No ☐ NA
- c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) ☐ Yes ☐ No ☒ NA

NOTE: If tanks are used, fill out checklist for tanks.

- d. Are the containers labeled and marked in accordance with Section D-3, D-4, and D-5 of this form? ☐ Yes ☐ No ☒ NA

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

- e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) ☐ Yes ☒ No ☐ NA
8. Describe storage area. Use photos and narrative explanation sheet.

Section E - Recordkeeping and Records (262.40)

1. Does generator keep the following reports for 3 years?

- a. Manifests and signed copies from ☒ Yes ☐ No ☐ NA
- b. Biennial Reports ☐ Yes ☐ No ☐ NA
- c. Exception reports ☐ Yes ☐ No ☐ NA
- d. Test results ☐ Yes ☐ No ☐ NA

2. Where are the records kept (at facility or elsewhere)?

3. Who is in charge of keeping the records?

Name Chad Swann Title _____

Section F - Special Conditions

1. Has generator received from or transported to a foreign Administrator?

__Yes ☒ No __NA

- a. If yes, has he filed a notice with the Regional Administrator?

__Yes __No ☒ NA

- b. Is this waste manifested and signed by a foreign cosignee?

__Yes __No ☒ NA

- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment?

__Yes __No ☒ NA

Appendix II - Less-than-Ninety Day Storage

1. Source/Data: Drums & Roll-off

2. Type(s) of waste: Roll-off F034

3. Condition of containers: Good

a. Containers closed?

☒ Yes ☐ No ☐ NA

b. Containers properly labelled?

☒ Yes ☐ No ☐ NA

c. Accumulation dates?

☒ Yes ☐ No ☐ NA

d. Area inspected?

☒ Yes ☐ No ☐ NA

Part ____

CONTAINERS CHECKLIST

Section A - Use and Management (264.171) (265.171)

1. Are containers in good condition? ☒ Yes ___ No ___ NA

Section B - Compatibility of Waste With Container (264.172)

1. Is container made of a material that will not react with the waste which it stores? ☒ Yes ___ No ___ NA

Section C - Management of Containers (264.173) (265.173)

1. Is container always closed while holding hazardous waste? ☒ Yes ___ No ___ NA
2. Is container handled so that it will not be opened, handled, or stored in a manner which may rupture it or cause it to leak? ☒ Yes ___ No ___ NA

Section D - Inspections (264.174) (265.174)

1. Does owner/operator inspect containers at least weekly for leaks and deterioration? ☒ Yes ___ No ___ NA

Section E - Containment (Part 264) (264.175)

1. Do container storage areas have a containment system? ___ Yes ___ No ☒ NA
- a. Is the base free of cracks or gaps? ___ Yes ___ No ☒ NA
- b. Is the base sloped or otherwise designed to drain and remove liquids? ___ Yes ___ No ☒ NA
- c. Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container? ___ Yes ___ No ☒ NA
- d. Is any method available to prevent run-on into the containment system? ___ Yes ___ No ☒ NA
- e. Is spilled or leaked material or accumulated precipitation removed from the containment area in a timely manner? ___ Yes ___ No ☒ NA

Section F - Ignitable and Reactive Waste (264.176) (265.176)

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines?

__Yes __No ☒ NA

Section G - Incompatible Waste (264.177) (265.177)

1. Are incompatible wastes or materials placed in the same containers?
2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?
3. Are incompatible wastes separated from each other by a berm, dike, wall, or other device?

__Yes ☒ No __NA

__Yes __No ☒ NA

__Yes __No ☒ NA

Section H - Closure (Part 264) (264.178)

1. At closure, were all hazardous wastes and associated residues removed from the containment system?

__Yes __No ☒ NA

Part ____

GROUNDWATER MONITORING CHECKLIST

Section A - Monitoring System

1. Does the facility have a groundwater monitoring system in operation? ☒ Yes ___ No ___ NA
- a. If yes, does the system consist of: (265.91)(264.97)
1. At least one upgradient/background well? ☒ Yes ___ No ___ NA
2. At least three downgradient wells? ☒ Yes ___ No ___ NA
- b. Are wells identified in the field? ☒ Yes ___ No ___ NA
- c. Are well heads in good condition (i.e. free of cracks)? ☒ Yes ___ No ___ NA
- d. Are well heads locked? ☒ Yes ___ No ___ NA
- e. Do well heads have bumper guards or are otherwise protected? ___ Yes ___ No ___ NA

Section B - Sampling and Analysis (Part 264)

1. Does the facility obtain and analyze samples from the groundwater monitoring system? ☒ Yes ___ No ___ NA
2. Has facility developed and followed a groundwater sampling and analysis plan? (264.97(d)) ☒ Yes ___ No ___ NA
- a. If yes, does this plan include procedures and techniques for:
1. Sample collection? ☒ Yes ___ No ___ NA
2. Sample preservation? ☒ Yes ___ No ___ NA
3. Analytical procedures? ☒ Yes ___ No ___ NA
4. Chain-of-custody control? ☒ Yes ___ No ___ NA
5. Determining the groundwater surface elevation? ☒ Yes ___ No ___ NA
3. Has facility specified a statistical method to be used in evaluating groundwater monitoring data? ___ Yes ___ No ___ NA
4. Is all groundwater monitoring data recorded in the operating record? ☒ Yes ___ No ___ NA

Section C - Detection Monitoring Program (264.98)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases?

__Yes __No ☒ NA

- a. If yes, are the following components included in the system:

1. Background values?

__Yes __No __NA

2. Determination of groundwater flow rate and direction annually? (264.98(e))

__Yes __No __NA

3. Determination of statistically significant increases over background concentrations at each well? (264.98(f))

__Yes __No __NA

4. If there was a statistically significant increase indicated, did the facility notify the Executive Director per 264.98(g)(1)?

__Yes __No __NA

5. Did facility attempt to demonstrate an apparent increase was not caused by a regulated unit per MHWMR 264.98(g)(6)?

__Yes __No __NA

6. Is all information contained in the facility's operating record?

__Yes __No __NA

Section D - Compliance Monitoring Program (264.99)

1. Does the facility operate a compliance monitoring program?

__Yes __No ☒ NA

- a. If yes, does the facility:

1. Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e))

__Yes __No __NA

2. Collect at least four samples from each well at least semi-annually? (264.99(f))

__Yes __No __NA

3. Determine whether there is statistically significant evidence of increased contamination at each monitoring well?

__Yes __No __NA

4. If an increase was indicated, did facility notify the Executive Director?

__Yes __No __NA

5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually?

__Yes __No __NA

6. Record all information in the operating record?

__Yes __No __NA

Section E - Corrective Action Program (Part 264 only) (264.100)

1. Does facility follow a corrective action program that meets the facility's permit requirements?

☒ Yes __No __NA

Section F - Sampling and Analysis (Part 265)

1. Has the facility developed and followed a groundwater sampling and analysis plan? ☒ Yes ☐ No ☐ NA
- a. If yes, does the plan include procedures and techniques for:
- 1. Sample collection? ☒ Yes ☐ No ☐ NA
 - 2. Sample preservation? ☒ Yes ☐ No ☐ NA
 - 3. Analytical procedure? ☒ Yes ☐ No ☐ NA
 - 4. Chain-of-custody control? ☒ Yes ☐ No ☐ NA
2. Has the owner/operator established initial background concentrations or values of all parameters specified in 265.92(b)? ☐ Yes ☐ No ☒ NA
- a. Samples collected to establish background quality (from above)? ☐ Yes ☐ No ☐ NA
- b. Samples collected to indicate contamination (from above)? ☐ Yes ☐ No ☐ NA
- c. Elevation of groundwater surface at each monitoring well at each sampling event? ☐ Yes ☐ No ☐ NA

Section G - Preparation, Evaluation, and Response (Part 265 only) (265.93)

1. Did owner/operator prepare an outline of a groundwater quality assessment program? ☐ Yes ☐ No ☒ NA
- a. If yes, did program determine the following:
- 1. Whether hazardous waste or hazardous waste constituents have entered the groundwater? ☐ Yes ☐ No ☐ NA
 - 2. Rate and extent of hazardous waste or hazardous waste constituent migration? ☐ Yes ☐ No ☐ NA
 - 3. Concentrations of hazardous waste or hazardous waste constituents in groundwater? ☐ Yes ☐ No ☐ NA
- b. For each well, has owner/operator calculated the arithmetic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean? ☐ Yes ☐ No ☐ NA
- c. Has owner/operator submitted information documenting any significant increase in comparisons for up-gradient wells (or decrease in pH)? ☐ Yes ☐ No ☐ NA
- d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional groundwater samples from

those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error)

___Yes ___No ___NA

1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days? ___Yes ___No ___NA
2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Executive Director within 15 days after notification (discussed above) a certified groundwater quality assessment program? ___Yes ___No ___NA
3. Did owner/operator implement the groundwater quality assessment program and, at a minimum, did he determine the following: ___Yes ___No ___NA
 - a. Rate and extent of migration of the hazardous waste constituents in the groundwater? ___Yes ___No ___NA
 - b. Concentrations of the hazardous waste in the groundwater? ___Yes ___No ___NA
4. Did owner/operator submit a report to the Executive Director containing the requests of the assessment outlined in No. 3 above within 15 days? ___Yes ___No ___NA
5. Did owner/operator notify the Executive Director of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the groundwater? ___Yes ___No ___NA
6. If owner/operator determined that hazardous waste or hazardous waste constituents entered the groundwater, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or groundwater quality assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if groundwater quality assessment plan was implemented during post-closure? ___Yes ___No ___NA
7. If any groundwater quality assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed program and reported to the Executive Director, as outlined in No. 4 above? ___Yes ___No ___NA
8. If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on groundwater elevation

obtained under No. 3c in Section F above
to determine whether the requirements for
locating monitoring wells are satisfied? ☐ Yes ☐ No ☐ NA

a. If evaluation shows that the requirements
for monitoring wells are not satisfied,
has owner/operator modified the number,
location, or depth of the monitoring wells
to bring the system into compliance? ☐ Yes ☐ No ☐ NA

Section H - Recordkeeping and Reporting (Part 265 only) (265.94)

N/A

1. Unless owner/operator is monitoring to satisfy the
requirements of Section 265.93(d)(4), does owner/
operator:

a. Keep records of the analyses required in Section
265.92(c) and (d), groundwater surface elevations
required in 265.93(b) throughout the active life
of the facility and throughout post-closure? ☐ Yes ☐ No ☐ NA

b. Report the following information to the Executive
Director:

1. Within 15 days of analysis for each quarterly
sampling event, does owner/operator submit
results of background concentrations? ☐ Yes ☐ No ☐ NA
2. Does owner/operator inform the Executive
Director about any parameters that exceed
maximum contaminant levels listed in Appendix
III? ☐ Yes ☐ No ☐ NA
3. (Annually) does owner/operator report
concentrations or values of parameters listed
in Section 265.92(b)(3) for each well, including
required evaluation for these parameters under
Section 265.93(b)? ☐ Yes ☐ No ☐ NA

a. Does owner/operator also identify
differences from initial background
concentrations found in the upgradient
wells no later than March 1 following
each calendar year? ☐ Yes ☐ No ☐ NA

2. Does owner/operator submit results of the groundwater
surface elevations under Section 265.93(f), along with
a description of the response, if needed? ☐ Yes ☐ No ☐ NA

3. If groundwater is monitored to satisfy requirements of Section 265.93(d)(4), did owner/operator do the following:

- a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure? ☐ Yes ☐ No ☐ NA
- b. (Annually, until final closure) submit to the Regional Administrator a report containing the results of the groundwater quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1? ☐ Yes ☐ No ☐ NA

Part ____

FINANCIAL REQUIREMENTS CHECKLIST

Section A - Closure

1. Is facility required to provide financial assurance for closure? Yes ☒ No ☒ NA ☐
- a. Type of financial assurance _____
- b. Amount of closure costs _____
1. Date of most recent adjustment _____
- c. Effective date of mechanism _____
- d. Expiration date of mechanism _____
- e. Is instrument adequate? Yes ☐ No ☐ NA ☐

Section B - Post-Closure

1. Is facility required to provide financial assurance for post-closure care? ☒ Yes ☐ No ☐ NA ☐
- a. Type of financial assurance Financial Test
- b. Amount of closure costs 188,740
1. Date of most recent adjustment MARCH 1997
- c. Effective date of mechanism April 1, 1997
- d. Expiration date of mechanism MARCH 31, 1998
- e. Is instrument adequate? ☒ Yes ☐ No ☐ NA ☐

Section C - Corrective Action

1. Is facility required to provide financial assurance for corrective action? ☒ Yes ☐ No ☐ NA ☐
- a. Type of financial assurance Financial Test
- b. Amount of closure costs 733,469
1. Date of most recent adjustment MARCH 1997
- c. Effective date of mechanism April 1, 1997
- d. Expiration date of mechanism MARCH 31, 1998
- e. Is instrument adequate? ☒ Yes ☐ No ☐ NA ☐

Section D - Liability Requirements

1. Is facility required to provide liability coverage for sudden accidental occurrences? ☒ Yes ☐ No ☐ NA ☐
- a. Type of assurance Financial Test
- b. Is amount at least \$1 million per occurrence, \$2 million annual aggregate? ☒ Yes ☐ No ☐ NA ☐
- c. Effective date of mechanism April 1, 1998

- d. Expiration date of mechanism March 31, 1997
2. Is facility required to provide liability coverage for non-sudden accidental occurrences? ☒ Yes ☐ No ☐ NA
- a. Type of assurance Financial Test
- b. Is amount at least \$3 million per occurrence, \$6 million annual aggregate? ☒ Yes ☐ No ☐ NA
- c. Effective date of mechanism April 1, 1997
- d. Expiration date of mechanism March 31, 1998

CHCKLIST:lr

A-Applicability 265.440**Yes No NA**

1. Does the owner/operator maintain a new or existing drip pad to convey treated wood drippage, precipitation, and/or surface water run-off to an associated collection system?
- a. Was the drip pad constructed prior to December 6, 1990?(If yes, omit B.4.)
- b. Is the drip pad inside or under a structure that provides protection from precipitation?(If yes, omit B.7.)
- c. Does the facility maintain and comply with a written contingency plan for infrequent and incidental drippage that describes how the facility will do the following:
1. Clean up the drippage?
 2. Document the cleanup of the drippage?
 3. Retain documents regarding cleanup for three years?
 4. Manage the contaminated media in a manner consistent with Federal regulations?

X — —
X — —
— X —
X — —
X — —
X — —
X — —

B - Design and operating requirements 265.443**Yes No NA**

1. Is the drip pad constructed as follows:
- a. Is the drip pad constructed of non-earthen materials, excepting wood and non-structurally supported asphalt?
- b. Is the drip pad sloped to free-drain treated wood drippage to the associated collection system?
- c. Does the drip pad have a curb or berm around the perimeter?
- d. i. Does the drip pad have a hydraulic conductivity of less than or equal to 10^{-7} cm/s?
- ii. Does the owner maintain on file at the facility a written assessment of the drip pad certified by an independent, qualified registered professional engineer? Is the assessment reviewed, updated and re-certified annually?
- e. Is the drip pad of sufficient structural strength and thickness to prevent failure?

X — —
X — —
X — —
X — —
X — —
X — —
X — —

If the drip pad complies with 1.d. then skip to 5.

2. Is the drip pad constructed with a synthetic liner?
3. Is there a leakage detection system in place that:
- a. Is constructed of materials that are chemically resistant to the managed waste and of sufficient strength to prevent collapse?
- b. Is designed and operated to function without clogging?
- c. Is designed to detect a release of hazardous waste?
4. Does the drip pad have a leakage collection system immediately above the liner?
5. Is the drip pad maintained free of cracks, gaps, corrosion, or other deterioration?
6. Is the drip pad designed to prevent run-off?
7. Is the drip pad designed to prevent run-on during a 24 hr. 25 yr. Storm or is the system capacity sufficient to contain any run-on that may enter the system?
8. Is drippage and accumulated precipitation removed from the associated collection system as necessary to prevent overflow onto the drip pad?

— X —
— V —
— — X
— — y
— X —
X — —
X — —
X — —
X — —

12/20/96

B - Design and operating requirements 265.443

Yes No NA

9. Is the drip pad cleaned at least weekly and the cleaning and cleaning procedure documented?
10. Is treated material held on the drip pad until drippage has ceased?

☒ ☐ ☐
☒ ☐ ☐

C - Inspections 265.444

Yes No NA

1. Is the drip pad inspected weekly and after storms to detect:
- a. Deterioration, malfunctions or improper operation of run-on and run-off control systems?
 - b. The presence of leakage in and proper function of leakage detection system?
 - c. Deterioration or cracking of the drip pad surface?

☒ ☐ ☐
☒ ☐ ☐
☒ ☐ ☐

Depending on the time
the change pulled 1/2 - 1 1/2 hrs

Incidental drippage inspections daily

Containers storage inspections weekly

separate records
for separate areas

surface impairment inspections weekly

Last training 3/11/97

Compliance Evaluation Inspection
Kerr-McGee Chemical Corporation
Columbus, Mississippi
MSD 990 866 329

96



FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

September 27, 1996

Chuck Swann
Kerr-McGee Chemical Corporation
P. O. Box 906
Columbus, Mississippi 39701

RE: Compliance Evaluation Inspection
Kerr-McGee Chemical Corporation
Columbus, Mississippi

Dear Mr. Swann:

Enclosed please find an inspection report and checklist that was completed as a result of a Hazardous Waste Compliance Inspection at the above referenced facility on September 5, 1996. This inspection revealed no apparent violations of Mississippi Hazardous Waste Management Regulation (MHWMR).

If you have any questions, do not hesitate to contact me at (601) 961-5141.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bruce Ferguson".

Bruce Ferguson
Hazardous Waste Division

Enclosure

cc: Steve Ladner, Kerr-McGee
U. S. EPA, Region IV

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
RCRA INSPECTION REPORT
COMPLIANCE EVALUATION INSPECTION
KERR-McGEE CHEMICAL CORPORATION
COLUMBUS, MISSISSIPPI**

FILE COPY

1. Inspector and Author of Report

Bruce Ferguson, EEII
Mississippi Office of Pollution Control (MOPC)

2. Facility Information

Kerr-McGee Chemical Corporation (KMCC)
Forest Products Division
P. O. Box 906
Columbus, Mississippi 39701
MSD990866329

3. Responsible company Official

Chuck Swann, KMCC

4. Inspection Participants

Chuck Swann, KMCC
Bruce Ferguson, MOPC

5. Date and Time of Inspection

September 5, 1996 @ 9:00 a.m.

6. Applicable Requirements

Mississippi Hazardous Waste Management Regulations (MHWMR) Parts 262, 264, 265, 268 and 279 and the facility's Hazardous Waste Post-Closure Permit No. HW-90-139-01.

7. Facility Description

The site now occupied by Kerr-McGee Chemical Corporation has been used as a wood treating facility since 1928. KMCC acquired the site in 1964 and continued to produce treated railroad ties, switch ties, crossings, and pilings using creosote as a preservative. Pentachlorophenol was also used as a preservative prior to 1976.

The facility is permitted to conduct post-closure and groundwater corrective action activities. In June of 1986, KMCC certified closure of two hazardous waste surface impoundments, an aeration basin and a sedimentation basin in which bottom sediment sludge from process wastewater accumulated. The surface impoundments were replaced by upgrading production process oil/water separators to recycle preservatives for re-application within the production process. The wastewater is then pumped to the wastewater treatment system which operates under a pre-treatment permit and is discharged to the City of Columbus POTW.

Presently, the groundwater corrective action system consists of 13 groundwater recovery wells and two recovery trenches. Recovered groundwater is pumped to an above ground oil-water separator with a

capacity of 35,000 gallons. After the separation process, the wastewater is sent through the facility wastewater treatment system and discharged to the POTW. During periods of heavy rains and subsequent high groundwater recovery rates, the facility uses a tank for storage of groundwater. This storage of groundwater is sometimes necessary to prevent exceeding the POTW discharge rates.

In 1988, KMCC installed a concrete drip track to collect excess preservative drippage from treated wood after removal from the pressure cylinder. In December of 1991, the drip track was certified by a professional engineer that the track met the requirements of 40 CFR 264.571. The drip pad operates under Part 265 Subpart W regulations.

The facility has two black tie storage areas. The smaller of the two areas is located north of 14th Avenue and the larger area is located south of 14th Avenue. A contingency plan is maintained at the facility for the remediation of incidental spills and drippage and these areas are therefore not subject to Part 265 Subpart W regulations.

The facility maintains a less than 90 day container storage area that consists of a roll-off box. The roll-off box is maintained on a concrete pad located beside the facility's drip pad.

9. Findings

The closed surface impoundments were inspected and found to be in good condition. The closed impoundment can be seen in Photograph 1. Erosion tends to occur in the southeast corner of the impoundment. The area where erosion occurs can be seen in the photograph as the larger lighter colored rock which has been placed to help prevent the erosion. The facility maintains documentation of the required inspection of the surface impoundment. The past year's inspection documentation was reviewed and found to be in order. The unit was inspected a minimum of three times a month and more recent inspections were conducted weekly.

A portion of the black tie storage area can be seen in Photograph 2. The yard appeared to be in good condition with no remarkable signs of incidental drippage. The facility maintains a contingency plan for the cleanup of incidental drippage. Inspection of the storage yard is conducted daily and documented. The last cleanup of incidental drippage was reported to be on July 22, 1996.

The drip pad can be seen in Photographs 3 and 4. The protective coating was replaced approximately one year ago. The pad appeared to be in good condition with no notable signs of cracks or gaps. The drip pad is inspected on a weekly basis. The documentation for the past year was reviewed and appeared to be in order. The facility also maintains documentation of the cleaning of the drip pad. The past years cleaning documentation was reviewed and appeared in order. The facility obtains a written assessment of the drip pad from a registered professional engineer annually. This assessment was last conducted on December 20, 1995.

The facility's less than 90 day storage container can be seen in Photograph 5. The container was properly labeled as hazardous waste and contained an accumulation date within the allowed 90 days. The container is located on a pad adjacent the facility's drip pad. Weekly inspections of the container storage area are conducted and documented.

The facility has dedicated an area for the decontamination of equipment at the facility. This area can be seen in Photograph 6. After the equipment is cleaned the water is pumped to the wastewater treatment system using the pump that is pictured in the photograph.

The hazardous waste manifests were reviewed and found to contain the proper information. Each manifest was signed by the generator and transporter and return copies were attached signed by the disposal facility. An operations training manual is maintained at the facility. The manual is divided into numbered sections of various types of training required. Each position at the facility is listed in the manual with the required

training sections to be covered. The training records are maintained on a computer. The most recent training related to RCRA was conducted on November 17, 1995.

Financial assurance for corrective action, post-closure activities and liability is provided through the use of a financial test. The financial assurance was submitted to the MOPC in March of 1996 and was found to meet the regulatory requirements.

10. **Conclusions**

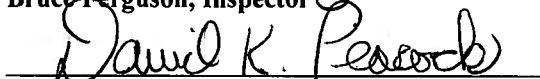
The facility was found to be in compliance with the applicable regulations and the Post-Closure permit.

11. **Signatures**



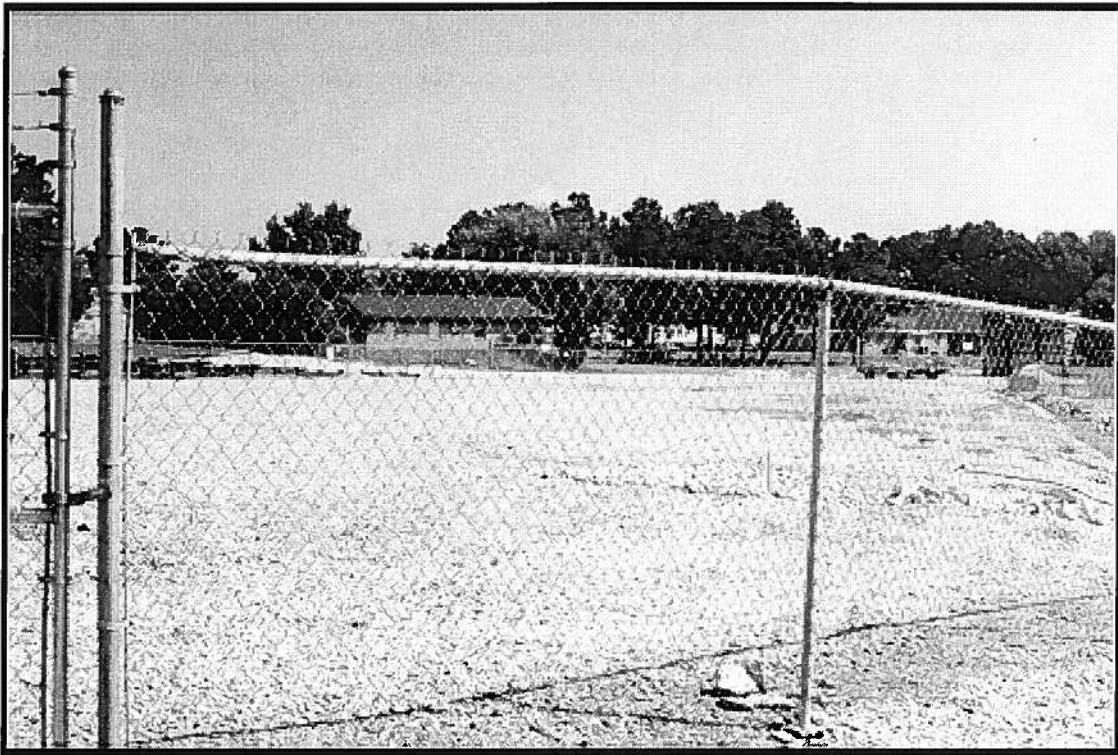
Bruce Ferguson, Inspector

9/27/96
Date



David Peacock, Supervisor

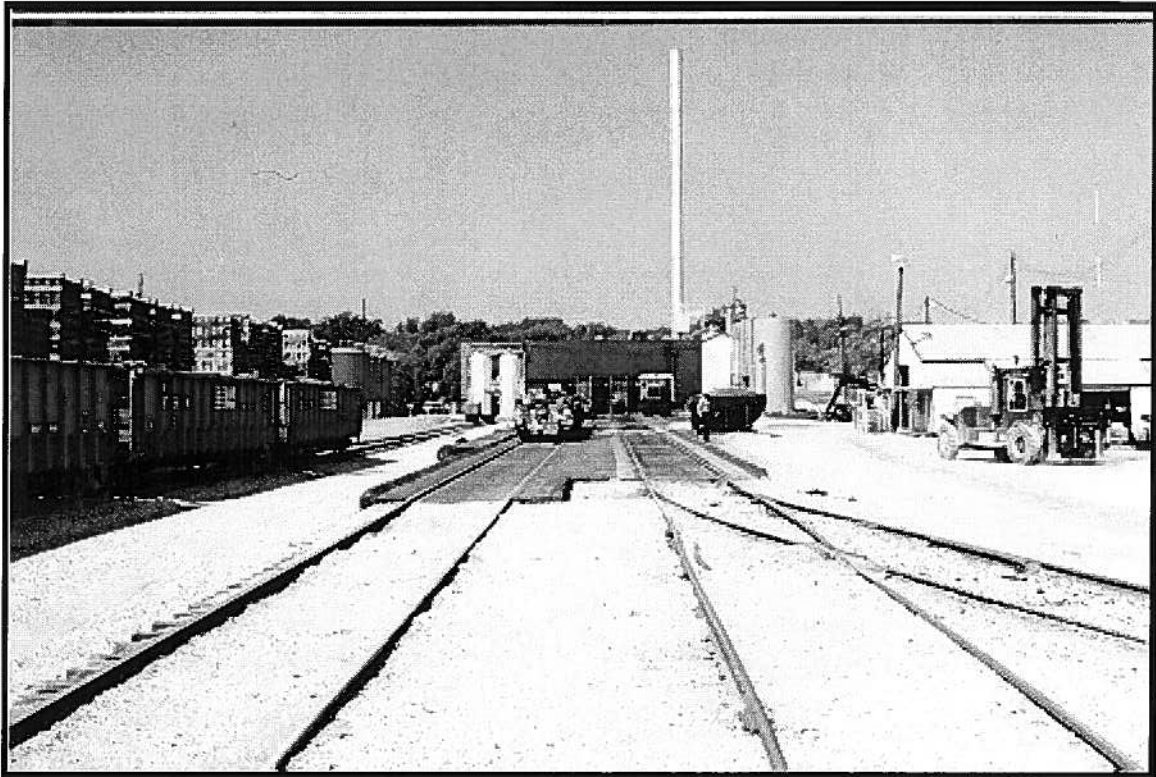
9/27/96
Date



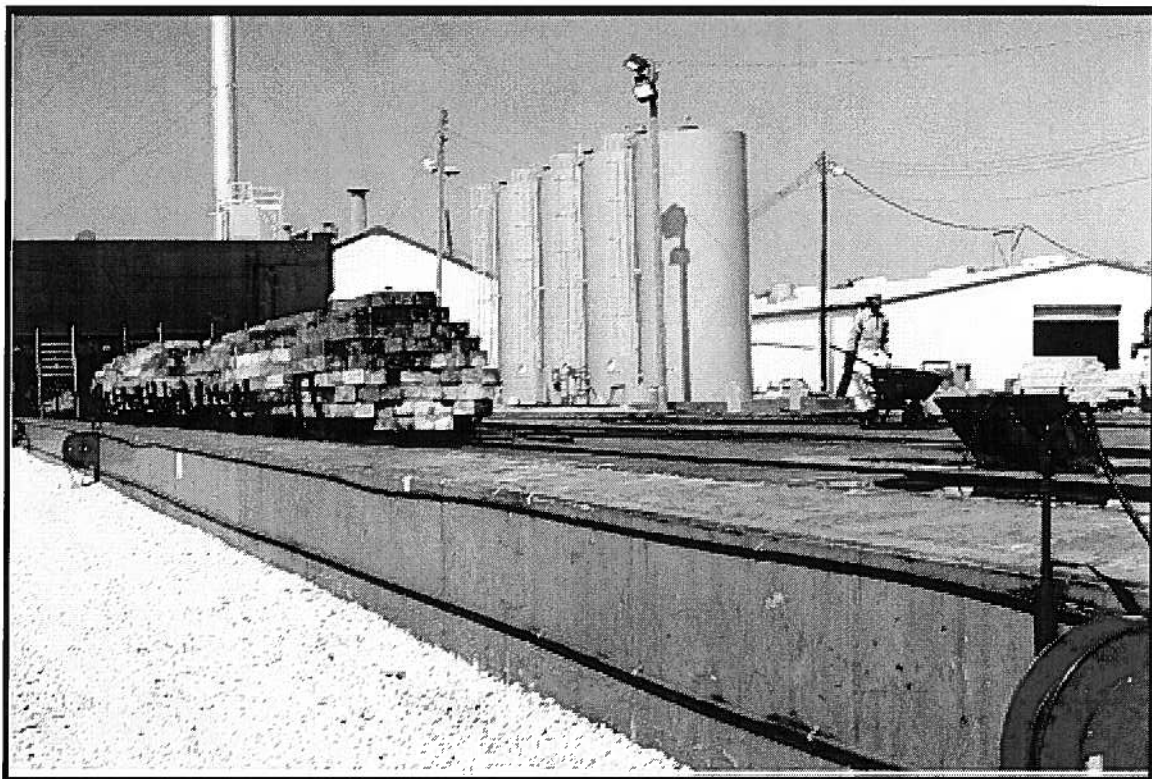
Photograph 1 - Closed surface impoundments.



Photograph 2 - Black tie storage area.



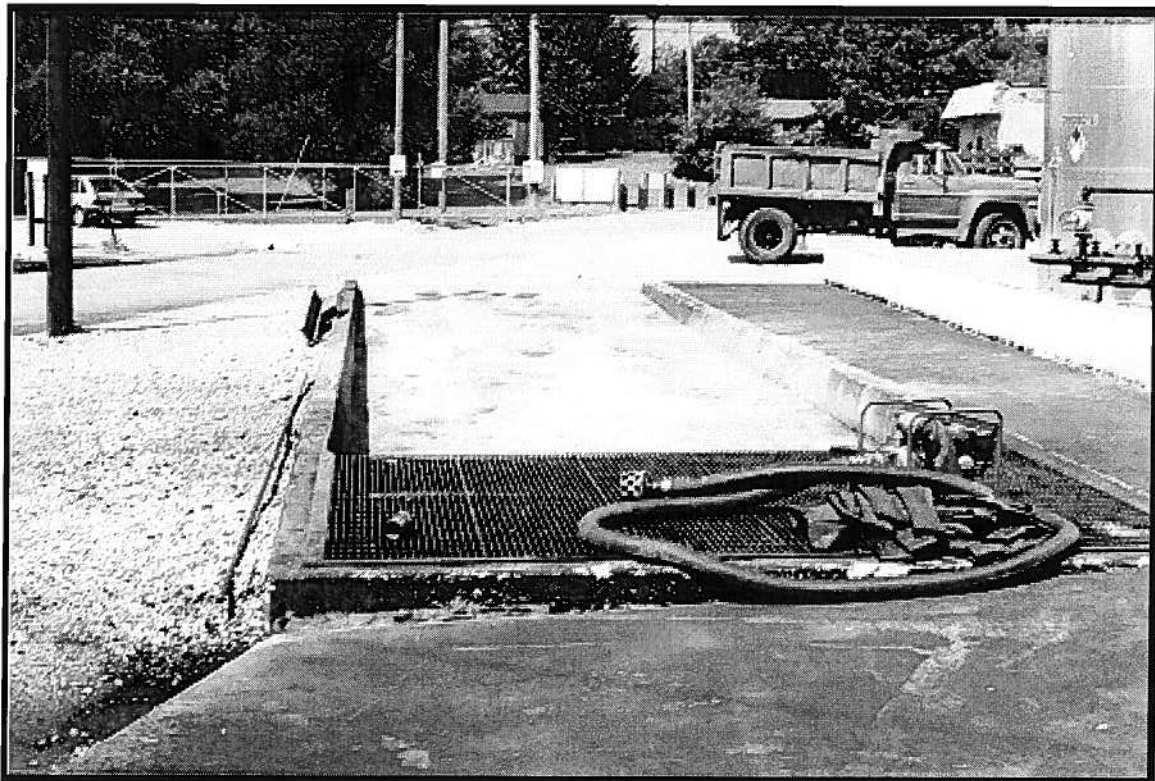
Photograph 3 - Drip track facing west.



Photograph 4 - Drip track facing northwest.



Photograph 5 - Less than 90 day container storage area.



Photograph 6 - Equipment decontamination area.

Part 1

General Site Information

Facility Name: Irr-Melco Chemical Corporation
Address: _____

I.D. Number: _____
Contact: Chuck Swan
Title: _____
Phone Number: _____

Type of Ownership:

___ Federal ___ State ___ County ___ Municipal X Private

Facility Status:

X Generator ___ Transporter ___ Treatment ___ Storage X Disposal

Regulatory Status:

___ Interim Status ___ Part B Submitted
X Permitted ___ Part B in Preparation

Principal Inspector Name: Bruce Ferguson Title: EE II
Organization: MDEQ Phone Number: _____

Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Representing</u>
<u>Chuck Swan</u>		<u>KMCC</u>
<u>Bruce Ferguson</u>		<u>MDEQ</u>

6396

- b. 1. Artificial or natural barrier around facility
(e.g., fence or fence and cliff)?

☒ Yes ☐ No ☐ NA

Describe fence

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)?

☒ Yes ☐ No ☐ NA

Describe _____

General Inspection Requirements (264.15) (265.15)

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

- a. Monitoring equipment?
b. Safety and emergency equipment?
c. Security devices:
d. Operating and structural equipment?
e. Types of problems of equipment:

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

1. Malfunction

☐ Yes ☐ No ☐ NA

2. Operator error

☐ Yes ☐ No ☐ NA

3. Discharges

☐ Yes ☐ No ☐ NA

6. Does the owner/operator maintain an inspection log?

☐ Yes ☐ No ☐ NA

- a. If yes, does it include:

1. Date and time of inspection?
2. Name of inspector?
3. Notation of observations?
4. Date and nature of repairs or remedial action?
5. Identification of potential problems?

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

- b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.)

☐ Yes ☒ No ☐ NA

- c. Are records kept a minimum of three years?

☒ Yes ☐ No ☐ NA

Personnel Training (264.16) (265.16)

7. Does the owner/operator maintain personnel training records at the facility?

☒ Yes ☐ No ☐ NA

Date of most recent training: 11/17/95

2. Is the facility equipped with: (264.32) (265.32)

a. Internal communication or alarm system?

☒ Yes ☐ No ☐ NA

1. Is it easily accessible in case of emergency? ☒ Yes ☐ No ☐ NA

b. Telephone or two-way radio to call emergency response personnel?

☒ Yes ☐ No ☐ NA

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?

☒ Yes ☐ No ☐ NA

d. Water of adequate volume of hoses, sprinklers, or water spray system?

☒ Yes ☐ No ☐ NA

1. Describe source of water

City of Columbus

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35) (265.35) ☐ Yes ☐ No ☒ NA

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.)

(264.37) (265.37)

☒ Yes ☐ No ☐ NA

5. In the case that more than one police or fire department might respond, is there a designated primary authority? ☐ Yes ☐ No ☒ NA
(264.37) (265.37)

a. If yes, name primary authority _____

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers?

(264.37) (265.37)

☒ Yes ☐ No ☐ NA

a. Are they really available to all personnel?

☒ Yes ☐ No ☐ NA

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (264.37)

(265.37)

☒ Yes ☐ No ☐ NA

8. If State or local authorities declined to enter into agreements, is this entered in the operating record?

(264.37) (265.37)

☐ Yes ☐ No ☒ NA

4. Does the owner/operator keep a written operating record at the facility? (264.73) (265.73)

☐ Yes ☐ No ☒ NA

a. If yes, does it include:

1. Description and quantity of each hazardous waste received?
2. Methods and dates of treatment, storage, and disposal?
3. Location and quantity of each hazardous waste at each location?
4. Cross-references to manifests/shipping papers?
5. Records and results of waste analyses?
6. Report of incidents involving implementation of the contingency plan?
7. Records and results of required inspections?
8. Monitoring, testing, and analytical data, for groundwater required by Subpart F?
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)?
10. Notices of generators as specified in Section 264.12(b) (Part 264)?

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

b. Does facility have copy of permit on site?

☒ Yes ☐ No ☐ NA

5. Does the facility submit a ^{annual} biennial report by March 1 every even-numbered year? (264.75) (265.75)

☒ Yes ☐ No ☐ NA

a. If yes, do reports contain the following information:

1. EPA I.D. number?
2. Date and year covered by report?
3. Description/quantity of hazardous waste?
4. Treatment, storage, and disposal methods?
5. Monitoring data under Section 265.94(a)(2) and (b)(2) (Part 265)?
6. Most recent closure and post-closure cost estimates?
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?
8. Certification signed by owner/operator?

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (264.76) (265.76)

☐ Yes ☒ No ☐ NA

a. If yes, has he submitted an unmanifested waste report to the Executive Director?

☐ Yes ☐ No ☒ NA

Part _____

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No.? (262.12)

☒ Yes ___ No ___ NA

a. If yes, EPA I.D. No. _____

Section B - Manifest

1. Does generator ship waste offsite? (262.20)

☒ Yes ___ No ___ NA

a. If no, do not fill out Sections B and D.

b. If yes, identify primary offsite facility(s).

Smelter Plant Waste

2. Does generator use manifest? (262.20)

☒ Yes ___ No ___ NA

a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)?

___ Yes ___ No ___ NA

1. If yes, does generator indicate this when sending waste to a TSD facility?

☒ Yes ___ No ___ NA

b. If yes, does manifest include the following information?

1. Manifest document No.

☒ Yes ___ No ___ NA

2. Generator's name, mailing address, telephone number

☒ Yes ___ No ___ NA

3. Generator EPA I.D. No.

☒ Yes ___ No ___ NA

4. Transporter Name(s) and EPA I.D. No.(s)

☒ Yes ___ No ___ NA

5. a. Facility name, address, and EPA I.D. No.

☒ Yes ___ No ___ NA

b. Alternate facility name, address, and EPA I.D. No.

☒ Yes ___ No ___ NA

c. Instructions to return to generator if undeliverable

☒ Yes ___ No ___ NA

6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number)

☒ Yes ___ No ___ NA

7. Emergency information (optional) (special handling instructions, telephone No.)

☒ Yes ___ No ___ NA

8. Is the following certification on each manifest form?

☒ Yes ___ No ___ NA

a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators?

☐ Yes ☐ No ☐ NA

- a. If yes, did generator test all wastes to determine nonhazardous characteristics?

☐ Yes ☐ No ☐ NA

1. If no, list wastes and quantities deemed nonhazardous or processes from which non-hazardous waste was produced (use additional sheet if necessary).

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30)

☒ Yes ☐ No ☐ NA

2. a. Are containers to be shipped leaking or corroding?

☒ Yes ☐ No ☐ NA

- b. Use sheet to describe containers and condition.

- c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31)

☒ Yes ☐ No ☐ NA

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

4. Does generator mark each package in accordance with 49 CFR 172?

☒ Yes ☐ No ☐ NA

5. Is each container of 110 gallons or less marked with the following label? (262.32)

☒ Yes ☐ No ☐ NA

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

Manifest document No. _____

6. Does generator have placards to offer to transporters? (262.33)

☐ Yes ☐ No ☐ NA

Section F - Special Conditions

1. Has generator received from or transported to a foreign Administrator?

☐ Yes ☒ No ☐ NA

- a. If yes, has he filed a notice with the Regional Administrator?

☐ Yes ☐ No ☒ NA

- b. Is this waste manifested and signed by a foreign cosignee?

☐ Yes ☐ No ☒ NA

- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment?

☐ Yes ☐ No ☒ NA

Section C - Detection Monitoring Program (264.98)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases? __Yes __No ☒ NA
- a. If yes, are the following components included in the system:
1. Background values? __Yes __No ☒ NA
 2. Determination of groundwater flow rate and direction annually? (264.98(e)) __Yes __No ☒ NA
 3. Determination of statistically significant increases over background concentrations at each well? (264.98(f)) __Yes __No ☒ NA
 4. If there was a statistically significant increase indicated, did the facility notify the Executive Director per 264.98(g)(1)? __Yes __No ☒ NA
 5. Did facility attempt to demonstrate an apparent increase was not caused by a regulated unit per MHWMR 264.98(g)(6)? __Yes __No ☒ NA
 6. Is all information contained in the facility's operating record? __Yes __No ☒ NA

Section D - Compliance Monitoring Program (264.99)

1. Does the facility operate a compliance monitoring program? __Yes __No ☒ NA
- a. If yes, does the facility:
1. Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) __Yes __No ☒ NA
 2. Collect at least four samples from each well at least semi-annually? (264.99(f)) __Yes __No ☒ NA
 3. Determine whether there is statistically significant evidence of increased contamination at each monitoring well? __Yes __No ☒ NA
 4. If an increase was indicated, did facility notify the Executive Director? __Yes __No ☒ NA
 5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually? __Yes __No ☒ NA
 6. Record all information in the operating record? __Yes __No ☒ NA

Section E - Corrective Action Program (Part 264 only) (264.100)

1. Does facility follow a corrective action program that meets the facility's permit requirements? ☒ Yes __No __NA

those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error)

__Yes __No ☒ NA

1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days?

__Yes __No ☒ NA

2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Executive Director within 15 days after notification (discussed above) a certified groundwater quality assessment program?

__Yes __No ☒ NA

3. Did owner/operator implement the groundwater quality assessment program and, at a minimum, did he determine the following:

__Yes __No ☒ NA

- a. Rate and extent of migration of the hazardous waste constituents in the groundwater?

__Yes __No ☒ NA

- b. Concentrations of the hazardous waste in the groundwater?

__Yes __No ☒ NA

4. Did owner/operator submit a report to the Executive Director containing the requests of the assessment outlined in No. 3 above within 15 days?

__Yes __No ☒ NA

5. Did owner/operator notify the Executive Director of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the groundwater?

__Yes __No ☒ NA

6. If owner/operator determined that hazardous waste or hazardous waste constituents entered the groundwater, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or groundwater quality assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if groundwater quality assessment plan was implemented during post-closure?

__Yes __No ☒ NA

7. If any groundwater quality assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed program and reported to the Executive Director, as outlined in No. 4 above?

__Yes __No ☒ NA

8. If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on groundwater elevation

3. If groundwater is monitored to satisfy requirements of Section 265.93(d)(4), did owner/operator do the following:

a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure?

__Yes __No NA

b. (Annually, until final closure) submit to the Regional Administrator a report containing the results of the groundwater quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1?

__Yes __No NA

d. Expiration date of mechanism March 1997

2. Is facility required to provide liability coverage for non-sudden accidental occurrences?

☒ Yes ☐ No ☐ NA

a. Type of assurance Financial Test

b. Is amount at least \$3 million per occurrence, \$6 million annual aggregate?

☒ Yes ☐ No ☐ NA

c. Effective date of mechanism March 1996

d. Expiration date of mechanism March 1997

CHECKLIST:lr

Compliance Evaluation Inspection
Kerr-McGee Chemical Corporation
Columbus, Mississippi
MSD 990 866 329

96



FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

September 27, 1996

Chuck Swann
Kerr-McGee Chemical Corporation
P. O. Box 906
Columbus, Mississippi 39701

RE: Compliance Evaluation Inspection
Kerr-McGee Chemical Corporation
Columbus, Mississippi

Dear Mr. Swann:

Enclosed please find an inspection report and checklist that was completed as a result of a Hazardous Waste Compliance Inspection at the above referenced facility on September 5, 1996. This inspection revealed no apparent violations of Mississippi Hazardous Waste Management Regulation (MHWMR).

If you have any questions, do not hesitate to contact me at (601) 961-5141.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bruce Ferguson", with a long horizontal flourish extending to the right.

Bruce Ferguson
Hazardous Waste Division

Enclosure

cc: Steve Ladner, Kerr-McGee
U. S. EPA, Region IV

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
RCRA INSPECTION REPORT
COMPLIANCE EVALUATION INSPECTION
KERR-McGEE CHEMICAL CORPORATION
COLUMBUS, MISSISSIPPI**

FILE COPY

1. Inspector and Author of Report

Bruce Ferguson, EEII
Mississippi Office of Pollution Control (MOPC)

2. Facility Information

Kerr-McGee Chemical Corporation (KMCC)
Forest Products Division
P. O. Box 906
Columbus, Mississippi 39701
MSD990866329

3. Responsible company Official

Chuck Swann, KMCC

4. Inspection Participants

Chuck Swann, KMCC
Bruce Ferguson, MOPC

5. Date and Time of Inspection

September 5, 1996 @ 9:00 a.m.

6. Applicable Requirements

Mississippi Hazardous Waste Management Regulations (MHWMR) Parts 262, 264, 265, 268 and 279 and the facility's Hazardous Waste Post-Closure Permit No. HW-90-139-01.

7. Facility Description

The site now occupied by Kerr-McGee Chemical Corporation has been used as a wood treating facility since 1928. KMCC acquired the site in 1964 and continued to produce treated railroad ties, switch ties, crossings, and pilings using creosote as a preservative. Pentachlorophenol was also used as a preservative prior to 1976.

The facility is permitted to conduct post-closure and groundwater corrective action activities. In June of 1986, KMCC certified closure of two hazardous waste surface impoundments, an aeration basin and a sedimentation basin in which bottom sediment sludge from process wastewater accumulated. The surface impoundments were replaced by upgrading production process oil/water separators to recycle preservatives for re-application within the production process. The wastewater is then pumped to the wastewater treatment system which operates under a pre-treatment permit and is discharged to the City of Columbus POTW.

Presently, the groundwater corrective action system consists of 13 groundwater recovery wells and two recovery trenches. Recovered groundwater is pumped to an above ground oil-water separator with a

capacity of 35,000 gallons. After the separation process, the wastewater is sent through the facility wastewater treatment system and discharged to the POTW. During periods of heavy rains and subsequent high groundwater recovery rates, the facility uses a tank for storage of groundwater. This storage of groundwater is sometimes necessary to prevent exceeding the POTW discharge rates.

In 1988, KMCC installed a concrete drip track to collect excess preservative drippage from treated wood after removal from the pressure cylinder. In December of 1991, the drip track was certified by a professional engineer that the track met the requirements of 40 CFR 264.571. The drip pad operates under Part 265 Subpart W regulations.

The facility has two black tie storage areas. The smaller of the two areas is located north of 14th Avenue and the larger area is located south of 14th Avenue. A contingency plan is maintained at the facility for the remediation of incidental spills and drippage and these areas are therefore not subject to Part 265 Subpart W regulations.

The facility maintains a less than 90 day container storage area that consists of a roll-off box. The roll-off box is maintained on a concrete pad located beside the facility's drip pad.

9. Findings

The closed surface impoundments were inspected and found to be in good condition. The closed impoundment can be seen in Photograph 1. Erosion tends to occur in the southeast corner of the impoundment. The area where erosion occurs can be seen in the photograph as the larger lighter colored rock which has been placed to help prevent the erosion. The facility maintains documentation of the required inspection of the surface impoundment. The past year's inspection documentation was reviewed and found to be in order. The unit was inspected a minimum of three times a month and more recent inspections were conducted weekly.

A portion of the black tie storage area can be seen in Photograph 2. The yard appeared to be in good condition with no remarkable signs of incidental drippage. The facility maintains a contingency plan for the cleanup of incidental drippage. Inspection of the storage yard is conducted daily and documented. The last cleanup of incidental drippage was reported to be on July 22, 1996.

The drip pad can be seen in Photographs 3 and 4. The protective coating was replaced approximately one year ago. The pad appeared to be in good condition with no notable signs of cracks or gaps. The drip pad is inspected on a weekly basis. The documentation for the past year was reviewed and appeared to be in order. The facility also maintains documentation of the cleaning of the drip pad. The past years cleaning documentation was reviewed and appeared in order. The facility obtains a written assessment of the drip pad from a registered professional engineer annually. This assessment was last conducted on December 20, 1995.

The facility's less than 90 day storage container can be seen in Photograph 5. The container was properly labeled as hazardous waste and contained an accumulation date within the allowed 90 days. The container is located on a pad adjacent the facility's drip pad. Weekly inspections of the container storage area are conducted and documented.

The facility has dedicated an area for the decontamination of equipment at the facility. This area can be seen in Photograph 6. After the equipment is cleaned the water is pumped to the wastewater treatment system using the pump that is pictured in the photograph.

The hazardous waste manifests were reviewed and found to contain the proper information. Each manifest was signed by the generator and transporter and return copies were attached signed by the disposal facility. An operations training manual is maintained at the facility. The manual is divided into numbered sections of various types of training required. Each position at the facility is listed in the manual with the required


training sections to be covered. The training records are maintained on a computer. The most recent training related to RCRA was conducted on November 17, 1995.

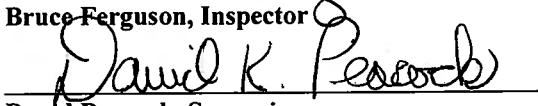
Financial assurance for corrective action, post-closure activities and liability is provided through the use of a financial test. The financial assurance was submitted to the MOPC in March of 1996 and was found to meet the regulatory requirements.

10. Conclusions

The facility was found to be in compliance with the applicable regulations and the Post-Closure permit.

11. Signatures



Bruce Ferguson, Inspector


David Peacock, Supervisor

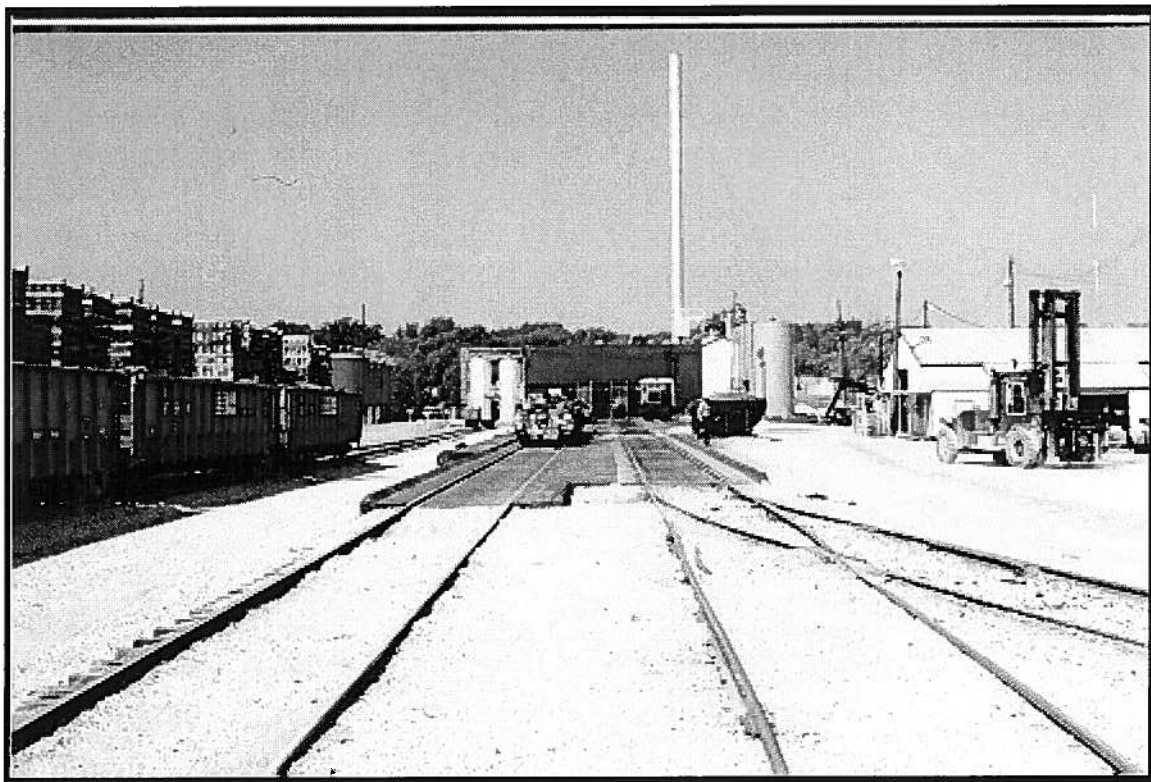
9/27/96
Date
9/27/96
Date



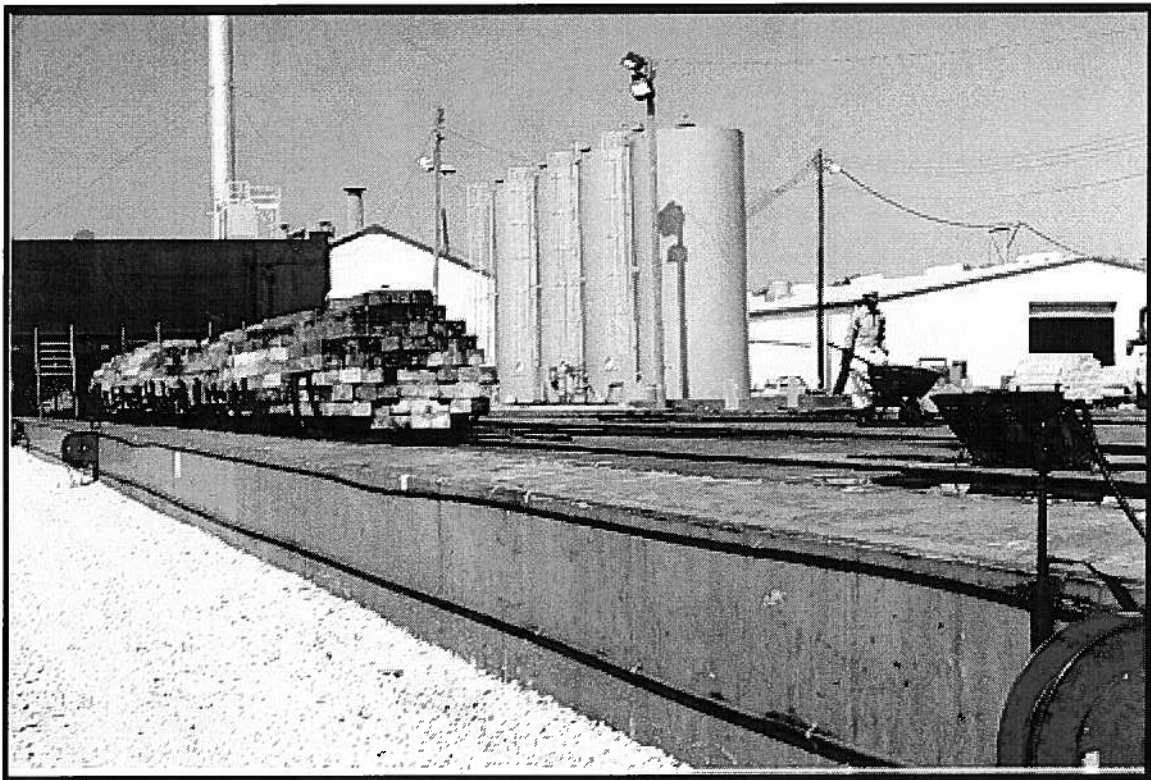
Photograph 1 - Closed surface impoundments.



Photograph 2 - Black tie storage area.



Photograph 3 - Drip track facing west.



Photograph 4 - Drip track facing northwest.



Photograph 5 - Less than 90 day container storage area.



Photograph 6 - Equipment decontamination area.

Part 1

General Site Information

Facility Name:

Address:

I.D. Number:

Contact:

Title:

Phone Number:

Type of Ownership:

☐ Federal ☐ State ☐ County ☐ Municipal ☒ Private

Facility Status:

☒ Generator ☐ Transporter ☐ Treatment ☐ Storage ☒ Disposal

Regulatory Status:

☐ Interim Status

☐ Part B Submitted

☒ Permitted

☐ Part B in Preparation

Principal Inspector Name:

Title:

Organization:

Phone Number:

Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Representing</u>
Chuck Swan		KMCC
Bruce Ferguson		MDEQ

6346

Part _____

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? ☒ Yes ☐ No ☐ NA
- a. If yes, EPA I.D. No. _____
If no, explain. _____
2. Has facility received hazardous waste from a foreign source? ☐ Yes ☒ No ☐ NA
- a. If yes, has it filed a notice with the Regional Administrator? ☐ Yes ☐ No ☒ NA

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ☒ Yes ☐ No ☐ NA
- a. If yes, does it include: (264.13) (265.13)
1. Parameters for which each waste will be analyzed? ☒ Yes ☐ No ☐ NA
 2. Test methods used to test for these parameters? ☒ Yes ☐ No ☐ NA
 3. Sampling method used to obtain sample? ☒ Yes ☐ No ☐ NA
 4. Frequency with which the initial analyses will be reviewed or repeated? ☒ Yes ☐ No ☐ NA
 5. (For offsite facilities) waste analyses that generators have agreed to supply? ☒ Yes ☐ No ☐ NA
 6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:
 - a. Procedures to be used to determine the identity of each movement of waste. ☐ Yes ☐ No ☒ NA
 - b. Sampling method to be used to obtain representative sample of the waste to be identified. ☐ Yes ☐ No ☒ NA
4. Does the facility provide adequate security through: (264.14) (265.14)
- a. 24-hour surveillance system (e.g., television monitoring or guards)? ☒ Yes ☐ No ☐ NA

OR

- b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)?

☒ Yes ☐ No ☐ NA

Describe

fence

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)?

☒ Yes ☐ No ☐ NA

Describe

General Inspection Requirements (264.15) (265.15)

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

- a. Monitoring equipment?
b. Safety and emergency equipment?
c. Security devices:
d. Operating and structural equipment?
e. Types of problems of equipment:

☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA

1. Malfunction
2. Operator error
3. Discharges

☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA
☐ Yes ☐ No ☐ NA

6. Does the owner/operator maintain an inspection log?

☐ Yes ☐ No ☐ NA

- a. If yes, does it include:

1. Date and time of inspection?
2. Name of inspector?
3. Notation of observations?
4. Date and nature of repairs or remedial action?
5. Identification of potential problems?

☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA

- b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.)

☐ Yes ☒ No ☐ NA

- c. Are records kept a minimum of three years?

☒ Yes ☐ No ☐ NA

Personnel Training (264.16) (265.16)

7. Does the owner/operator maintain personnel training records at the facility?

☒ Yes ☐ No ☐ NA

Date of most recent training:

11/17/95

How long are they kept?

Indefinite

a. If yes, do they include:

1. Job title and written job description of each position? ☒ Yes ☐ No ☐ NA
2. Description of type and amount of training? ☒ Yes ☐ No ☐ NA
3. Records of training given to facility personnel? ☒ Yes ☐ No ☐ NA

Requirements for Ignitable, Reactive, or Incompatible Waste
(264.17) (265.17)

8. Does facility handle ignitable or reactive wastes? ☐ Yes ☒ No ☐ NA

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flames confined to specifically designated locations? ☐ Yes ☐ No ☒ NA

c. Are "No Smoking" signs posted in hazardous areas? ☐ Yes ☐ No ☒ NA

d. Are precautions documented (Part 264 only)? ☐ Yes ☐ No ☒ NA

9. Check containers

a. Are containers leaking or corroding? ☐ Yes ☒ No ☐ NA

b. Is there evidence of heat generation from incompatible wastes? ☐ Yes ☒ No ☐ NA

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31) ☐ Yes ☒ No ☐ NA

If yes, use narrative explanation sheet to explain.

2. Is the facility equipped with: (264.32) (265.32)

a. Internal communication or alarm system?

☒ Yes ☐ No ☐ NA

1. Is it easily accessible in case of emergency? ☒ Yes ☐ No ☐ NA

b. Telephone or two-way radio to call emergency response personnel?

☒ Yes ☐ No ☐ NA

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?

☒ Yes ☐ No ☐ NA

d. Water of adequate volume of hoses, sprinklers, or water spray system?

☒ Yes ☐ No ☐ NA

1. Describe source of water

City of Columbus

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35) (265.35) ☐ Yes ☐ No ☒ NA

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (264.37) (265.37)

☒ Yes ☐ No ☐ NA

5. In the case that more than one police or fire department might respond, is there a designated primary authority? ☐ Yes ☐ No ☒ NA (264.37) (265.37)

a. If yes, name primary authority _____

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? (264.37) (265.37)

☒ Yes ☐ No ☐ NA

a. Are they readily available to all personnel?

☒ Yes ☐ No ☐ NA

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (264.37) (265.37)

☒ Yes ☐ No ☐ NA

8. If State or local authorities declined to enter into agreements, is this entered in the operating record? (264.37) (265.37)

☐ Yes ☐ No ☒ NA

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility?
(264.53) (265.53) ☒ Yes ☐ No ☐ NA
- a. If yes, is it a revised SPCC Plan? ☒ Yes ☐ No ☐ NA
- b. Does contingency plan include: (264.52) (265.52)
1. Arrangements with local emergency response organizations? ☒ Yes ☐ No ☐ NA
2. Emergency coordinator's names, phone numbers and addresses? ☒ Yes ☐ No ☐ NA
3. List of all emergency equipment at facility and descriptions of equipment? ☒ Yes ☐ No ☐ NA
4. Evacuation plan for facility personnel? ☒ Yes ☐ No ☐ NA
2. Is there an emergency coordinator on site or on call at all times? (264.55) (265.55) ☒ Yes ☐ No ☐ NA

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, does the owner/operator retain copies of all manifests? ☐ Yes ☐ No ☒ NA
1. Are the manifests signed and dated and returned to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, is it accompanied by a shipping paper? ☐ Yes ☐ No ☒ NA
1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72) ☐ Yes ☐ No ☒ NA
- a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? ☐ Yes ☐ No ☒ NA
1. If no, has Regional Administrator been notified? ☐ Yes ☐ No ☒ NA

4. Does the owner/operator keep a written operating record at the facility? (264.73) (265.73)

☐ Yes ☐ No ☒ NA

a. If yes, does it include:

1. Description and quantity of each hazardous waste received?
2. Methods and dates of treatment, storage, and disposal?
3. Location and quantity of each hazardous waste at each location?
4. Cross-references to manifests/shipping papers?
5. Records and results of waste analyses?
6. Report of incidents involving implementation of the contingency plan?
7. Records and results of required inspections?
8. Monitoring, testing, and analytical data, for groundwater required by Subpart F?
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)?
10. Notices of generators as specified in Section 264.12(b) (Part 264)?

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

b. Does facility have copy of permit on site?

☒ Yes ☐ No ☐ NA

5. Does the facility submit a ^{Annual} biennial report by March 1 every even-numbered year? (264.75) (265.75)

☒ Yes ☐ No ☐ NA

a. If yes, do reports contain the following information:

1. EPA I.D. number?
2. Date and year covered by report?
3. Description/quantity of hazardous waste?
4. Treatment, storage, and disposal methods?
5. Monitoring data under Section 265.94(a)(2) and (b)(2) (Part 265)?
6. Most recent closure and post-closure cost estimates?
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?
8. Certification signed by owner/operator?

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (264.76) (265.76)

☐ Yes ☒ No ☐ NA

a. If yes, has he submitted an unmanifested waste report to the Executive Director?

☐ Yes ☐ No ☒ NA

7. Does the facility submit to the Executive Director reports on releases, fires, and explosions; contamination and monitoring data; and facility closure?

☒ Yes ☐ No ☐ NA

Part _____

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No.? (262.12)

☒ Yes ☐ No ☐ NA

a. If yes, EPA I.D. No. _____

Section B - Manifest

1. Does generator ship waste offsite? (262.20)

☒ Yes ☐ No ☐ NA

a. If no, do not fill out Sections B and D.

b. If yes, identify primary offsite facility(s).

Smith Chemical Waste

2. Does generator use manifest? (262.20)

☒ Yes ☐ No ☐ NA

a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)?

☐ Yes ☐ No ☐ NA

1. If yes, does generator indicate this when sending waste to a TSD facility?

☒ Yes ☐ No ☐ NA

b. If yes, does manifest include the following information?

1. Manifest document No.

☒ Yes ☐ No ☐ NA

2. Generator's name, mailing address, telephone number

☒ Yes ☐ No ☐ NA

3. Generator EPA I.D. No.

☒ Yes ☐ No ☐ NA

4. Transporter Name(s) and EPA I.D. No.(s)

☒ Yes ☐ No ☐ NA

5. a. Facility name, address, and EPA I.D. No.

☒ Yes ☐ No ☐ NA

b. Alternate facility name, address, and EPA I.D. No.

☒ Yes ☐ No ☐ NA

c. Instructions to return to generator if undeliverable

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number)

☒ Yes ☐ No ☐ NA

7. Emergency information (optional) (special handling instructions, telephone No.)

☒ Yes ☐ No ☐ NA

8. Is the following certification on each manifest form?

☒ Yes ☐ No ☐ NA

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? ☒ Yes ___ No ___ NA

If yes, complete a through e.

a. 1. Did generator sign and date all manifests? ☒ Yes ___ No ___ NA
2. Who signed for generator?

Name Vara Title _____

b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ___ Yes ___ No ___ NA
2. Who signed and dated for transporter?

Name Vara Title _____

c. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ___ No ___ NA
d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ___ No ___ NA
e. Does generator retain copies for 3 years? ☒ Yes ___ No ___ NA

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? (261.30) ___ Yes ___ No ___ NA

a. If yes, list waste and quantities (include EPA Hazardous Waste No.) _____

2. Does generator solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20) ☒ Yes ___ No ___ NA

a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) DEC 1

b. Does generator determine characteristics by testing or by applying knowledge of processes? _____

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ___ Yes ___ No ___ NA

- a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators? ☐ Yes ☐ No ☐ NA

a. If yes, did generator test all wastes to determine nonhazardous characteristics? ☐ Yes ☐ No ☐ NA

1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30) ☒ Yes ☐ No ☐ NA
2. a. Are containers to be shipped leaking or corroding? ☒ Yes ☐ No ☐ NA
b. Use sheet to describe containers and condition.
c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31) ☐ Yes ☒ No ☐ NA
3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? ☒ Yes ☐ No ☐ NA
4. Does generator mark each package in accordance with 49 CFR 172? ☒ Yes ☐ No ☐ NA
5. Is each container of 110 gallons or less marked with the following label? (262.32) ☒ Yes ☐ No ☐ NA

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

Manifest document No. _____

6. Does generator have placards to offer to transporters? (262.33) ☐ Yes ☐ No ☐ NA

7. Accumulation time: (262.34)

a. Are containers used to temporarily store waste before transport?

☒ Yes ___ No ___ NA

1. If yes, is each container clearly dated:
Also, fill out rest of No. 7 (accum. time)

☒ Yes ___ No ___ NA

b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections)

☒ Yes ___ No ___ NA

2. If yes, with what frequency?

Weekly

c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes)

___ Yes ___ No ☒ NA

NOTE: If tanks are used, fill out checklist for tanks.

d. Are the containers labeled and marked in accordance with Section D-3, D-4, and D-5 of this form?

☒ Yes ___ No ___ NA

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.)

☒ Yes ___ No ___ NA

8. Describe storage area. Use photos and narrative explanation sheet.

Section E - Recordkeeping and Records (262.40)

1. Does generator keep the following reports for 3 years?

- a. Manifests and signed copies from
- b. Biennial Reports
- c. Exception reports
- d. Test results

☒ Yes ___ No ___ NA
☒ Yes ___ No ___ NA
☒ Yes ___ No ___ NA
☒ Yes ___ No ___ NA

2. Where are the records kept (at facility or elsewhere)?

Facility

3. Who is in charge of keeping the records?

Name Chuck Swan Title _____

Section F - Special Conditions

1. Has generator received from or transported to a foreign Administrator?

☐ Yes ☒ No ☐ NA

- a. If yes, has he filed a notice with the Regional Administrator?

☐ Yes ☐ No ☒ NA

- b. Is this waste manifested and signed by a foreign cosignee?

☐ Yes ☐ No ☒ NA

- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment?

☐ Yes ☐ No ☒ NA

Section C - Detection Monitoring Program (264.98)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases?

___ Yes ___ No ☒ NA

- a. If yes, are the following components included in the system:

1. Background values?
2. Determination of groundwater flow rate and direction annually? (264.98(e))
3. Determination of statistically significant increases over background concentrations at each well? (264.98(f))
4. If there was a statistically significant increase indicated, did the facility notify the Executive Director per 264.98(g)(1)?
5. Did facility attempt to demonstrate an apparent increase was not caused by a regulated unit per MHWMR 264.98(g)(6)?
6. Is all information contained in the facility's operating record?

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

Section D - Compliance Monitoring Program (264.99)

1. Does the facility operate a compliance monitoring program?

___ Yes ___ No ☒ NA

- a. If yes, does the facility:

1. Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e))
2. Collect at least four samples from each well at least semi-annually? (264.99(f))
3. Determine whether there is statistically significant evidence of increased contamination at each monitoring well?
4. If an increase was indicated, did facility notify the Executive Director?
5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually?
6. Record all information in the operating record?

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

Section E - Corrective Action Program (Part 264 only) (264.100)

1. Does facility follow a corrective action program that meets the facility's permit requirements?

☒ Yes ___ No ___ NA

Section F - Sampling and Analysis (Part 265)

1. Has the facility developed and followed a groundwater sampling and analysis plan?

☒ Yes ☐ No ☐ NA

a. If yes, does the plan include procedures and techniques for:

1. Sample collection?
2. Sample preservation?
3. Analytical procedure?
4. Chain-of-custody control?

☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA

2. Has the owner/operator established initial background concentrations or values of all parameters specified in 265.92(b)?

☐ Yes ☒ No ☐ NA

a. Samples collected to establish background quality (from above)?

☐ Yes ☐ No ☐ NA

b. Samples collected to indicate contamination (from above)?

☐ Yes ☐ No ☐ NA

c. Elevation of groundwater surface at each monitoring well at each sampling event?

☐ Yes ☐ No ☐ NA

Section G - Preparation, Evaluation, and Response (Part 265 only) (265.93)

1. Did owner/operator prepare an outline of a groundwater quality assessment program?

☐ Yes ☐ No ☒ NA

a. If yes, did program determine the following:

1. Whether hazardous waste or hazardous waste constituents have entered the groundwater?

☐ Yes ☐ No ☒ NA

2. Rate and extent of hazardous waste or hazardous waste constituent migration?

☐ Yes ☐ No ☒ NA

3. Concentrations of hazardous waste or hazardous waste constituents in groundwater?

☐ Yes ☐ No ☒ NA

b. For each well, has owner/operator calculated the arithmetic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean?

☐ Yes ☐ No ☒ NA

c. Has owner/operator submitted information documenting any significant increase in comparisons for up-gradient wells (or decrease in pH)?

☐ Yes ☐ No ☒ NA

d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional groundwater samples from

those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error)

__Yes __No ☒ NA

1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days?

__Yes __No ☒ NA

2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Executive Director within 15 days after notification (discussed above) a certified groundwater quality assessment program?

__Yes __No ☒ NA

3. Did owner/operator implement the groundwater quality assessment program and, at a minimum, did he determine the following:

__Yes __No ☒ NA

- a. Rate and extent of migration of the hazardous waste constituents in the groundwater?

__Yes __No ☒ NA

- b. Concentrations of the hazardous waste in the groundwater?

__Yes __No ☒ NA

4. Did owner/operator submit a report to the Executive Director containing the requests of the assessment outlined in No. 3 above within 15 days?

__Yes __No ☒ NA

5. Did owner/operator notify the Executive Director of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the groundwater?

__Yes __No ☒ NA

6. If owner/operator determined that hazardous waste or hazardous waste constituents entered the groundwater, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or groundwater quality assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if groundwater quality assessment plan was implemented during post-closure?

__Yes __No ☒ NA

7. If any groundwater quality assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed program and reported to the Executive Director, as outlined in No. 4 above?

__Yes __No ☒ NA

8. If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on groundwater elevation

obtained under No. 3c in Section F above to determine whether the requirements for locating monitoring wells are satisfied?

☐ Yes ☐ No ☒ NA

- a. If evaluation shows that the requirements for monitoring wells are not satisfied, has owner/operator modified the number, location, or depth of the monitoring wells to bring the system into compliance?

☐ Yes ☐ No ☒ NA

Section H - Recordkeeping and Reporting (Part 265 only) (265.94)

1. Unless owner/operator is monitoring to satisfy the requirements of Section 265.93(d)(4), does owner/operator:

- a. Keep records of the analyses required in Section 265.92(c) and (d), groundwater surface elevations required in 265.93(b) throughout the active life of the facility and throughout post-closure?
- b. Report the following information to the Executive Director:

☒ Yes ☐ No ☒ NA

1. Within 15 days of analysis for each quarterly sampling event, does owner/operator submit results of background concentrations?
2. Does owner/operator inform the Executive Director about any parameters that exceed maximum contaminant levels listed in Appendix III?
3. (Annually) does owner/operator report concentrations or values of parameters listed in Section 265.92(b)(3) for each well, including required evaluation for these parameters under Section 265.93(b)?

☐ Yes ☐ No ☒ NA

☒ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

- a. Does owner/operator also identify differences from initial background concentrations found in the upgradient wells no later than March 1 following each calendar year?

☐ Yes ☐ No ☒ NA

2. Does owner/operator submit results of the groundwater surface elevations under Section 265.93(f), along with a description of the response, if needed?

☐ Yes ☐ No ☒ NA

3. If groundwater is monitored to satisfy requirements of Section 265.93(d)(4), did owner/operator do the following:

a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure?

___Yes ___No NA

b. (Annually, until final closure) submit to the Regional Administrator a report containing the results of the groundwater quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1?

___Yes ___No NA

Part _____

FINANCIAL REQUIREMENTS CHECKLIST

Section A - Closure

1. Is facility required to provide financial assurance for closure? ☒ Yes ☒ No ☐ NA
- a. Type of financial assurance _____
- b. Amount of closure costs _____
1. Date of most recent adjustment _____
- c. Effective date of mechanism _____
- d. Expiration date of mechanism _____
- e. Is instrument adequate? ☒ Yes ☐ No ☐ NA

Section B - Post-Closure

1. Is facility required to provide financial assurance for post-closure care? ☒ Yes ☐ No ☐ NA
- a. Type of financial assurance Financial Test
- b. Amount of closure costs \$190,767
1. Date of most recent adjustment March 1996
- c. Effective date of mechanism March 1996
- d. Expiration date of mechanism March 1997
- e. Is instrument adequate? ☒ Yes ☐ No ☐ NA

Section C - Corrective Action

1. Is facility required to provide financial assurance for corrective action? ☒ Yes ☐ No ☐ NA
- a. Type of financial assurance Financial Test
- b. Amount of closure costs \$719,087
1. Date of most recent adjustment March 1996
- c. Effective date of mechanism March 1996
- d. Expiration date of mechanism March 1997
- e. Is instrument adequate? ☒ Yes ☐ No ☐ NA

Section D - Liability Requirements

1. Is facility required to provide liability coverage for sudden accidental occurrences? ☒ Yes ☐ No ☐ NA
- a. Type of assurance Financial Test
- b. Is amount at least \$1 million per occurrence, \$2 million annual aggregate? ☒ Yes ☐ No ☐ NA
- c. Effective date of mechanism March 1996

d. Expiration date of mechanism March 1997

2. Is facility required to provide liability coverage for non-sudden accidental occurrences?

☒ Yes ☐ No ☐ NA

a. Type of assurance Financial Test

b. Is amount at least \$3 million per occurrence, \$6 million annual aggregate?

☒ Yes ☐ No ☐ NA

c. Effective date of mechanism March 1996

d. Expiration date of mechanism March 1997

CHECKLIST:lr

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
RCRA INSPECTION REPORT
COMPLIANCE EVALUATION INSPECTION
KERR-McGEE CHEMICAL CORPORATION
COLUMBUS, MISSISSIPPI**

1. Inspector and Author of Report

Bruce Ferguson, EEII
Mississippi Office of Pollution Control (MOPC)

2. Facility Information

Kerr-McGee Chemical Corporation (KMCC)
Forest Products Division
P. O. Box 906
Columbus, Mississippi 39701
MSD990866329

3. Responsible Company Official

Tony Helms, Plant Manager
Kerr-McGee Chemical Corporation

4. Inspection Participants

Chuck Swann, KMCC
Bruce Ferguson, MOPC

5. Date and Time of Inspection

August 17, 1995, 11:00 a.m. CST.

6. Applicable Requirements

Mississippi Hazardous Waste Management Regulations (MHWMR) Parts 262, 264, 265, 268 and 279 and the facility's Hazardous Waste Post-Closure Permit No. HW-90-139-01.

7. Facility Description

The site now occupied by Kerr-McGee Chemical Corporation has been used as a wood treating facility since 1928. KMCC acquired the site in 1964 and continued to produce treated railroad ties, switch ties, crossings, and pilings using creosote as a preservative. Pentachlorophenol was also used as a preservative prior to 1976.

The facility is permitted to conduct post-closure and groundwater corrective action

activities. In June of 1986, KMCC certified closure of two hazardous waste surface impoundments, an aeration basin and a sedimentation basin in which bottom sediment sludge from process wastewater accumulated. The surface impoundments were replaced by upgrading production process oil/water separators to recycle preservatives for re-application within the production process. The wastewater is then pumped to the wastewater treatment system which operates under a pre-treatment permit and is discharged to the City of Columbus POTW.

Presently, the groundwater corrective action system consists of 13 groundwater recovery wells and two recovery trenches. Recovered groundwater is pumped to an aboveground oil-water separator with a capacity of 35,000 gallons (Photograph 7). After the separation process, the wastewater is sent through the facility wastewater treatment system and discharged to the POTW. During periods of heavy rains and subsequent high groundwater recovery rates, the facility uses a tank for storage of groundwater. This storage of groundwater is sometimes necessary to prevent exceeding the POTW discharge limits.

In 1988, KMCC installed a concrete drip track to collect excess preservative drippage from treated wood after removal from the pressure cylinder. In December of 1991, the drip track was certified by a professional engineer that the track met the requirements of 40 CFR 264.571. The drip pad operates under Part 265 Subpart W regulations.

The facility has two black tie storage areas. The smaller of the two areas is located north of 14th Avenue and the larger area is located south of 14th Avenue. The facility maintains a contingency plan at the facility for the remediation of incidental spills and drippage and these areas are therefore not subject to Part 265 Subpart W regulations.

The facility maintains a less than 90 day container storage area that consists of a roll-off box. The roll-off box is maintained on a concrete pad located beside the facility's drip pad.

The HSWA portion of the facility's RCRA Permit was issued August 1, 1995.

9. Findings

The regulated units at the facility were visually inspected. The closed surface impoundments can be seen in Photograph 1. The impoundment area appeared to be in good condition with no signs of erosion of the cover. Facility records show that the impoundment is inspected three times a month. Problem areas are noted when encountered and corrected.

The facility has two black tie storage areas. The largest is south of 14th Avenue and can be seen in Photograph 2. The view for the photograph is from the approximate center of the facility property facing east. Photograph 8 shows the black tie storage area north of 14th Avenue. The view for the photograph is at the southern end of the

area facing north. The black tie storage areas appeared to be in good condition with no apparent spills and few areas with incidental drippage. One of the occurrences of incidental drippage can be seen in Photograph 3. The facility maintains a contingency plan for cleaning up incidental spills and drippage. The cleanup is documented and the documentation is maintained at the facility.

The facility maintains a drip pad which can be seen in Photograph 4. The drip pad was scheduled to be coated the week following the inspection with a thicker longer lasting material than had been used in the past. The pad has a berm around the perimeter to prevent run off and run-on during storm events. Precipitation and wash water from the pad drains to a sump located in the area pictured in Photograph 6. The water is then pumped to the wastewater treatment system. The drip pad is well maintained and records show that the pad is cleaned at a minimum twice a week using a pressure cleaner, broom and emulsifier and is inspected at least weekly.

Drippage certification reports are maintained at the facility. The reports document the length of time a charge is kept on the drip pad and that the charge is not dripping when it is removed. The charges are typically held on the drip pad for one to three hours. Charges that are pulled at night are held on the drip pad until the next morning.

Soils from the cleanup of incidental drippage in the black tie storage areas and solids from the cleanup of the drip pad are stored in a roll-off box. This box can be seen in Photograph 5. The material is properly disposed as a hazardous waste once every 90 days or when the roll-off box has been filled. Under normal circumstances the roll-off is not filled in less than 90 days. The facility maintains hazardous waste manifests for shipments of hazardous waste. These records were reviewed and found to be in order.

As required by a recent post-closure permit modification, the facility has installed two wells in the Eutaw formation to replace Eutaw wells that have been plugged and abandoned. These wells were abandoned because they were in areas which contained free product in the alluvial formation and provided a potential migration path to the Eutaw formation. Photographs 9 and 10 show the locations of the replacement wells. The well in Photograph 9 is located near the southern property boundary of the cemetery and the eastern boundary of the cemetery property leased by Kerr-McGee. The view in Photograph 9 is facing north. The well in Photograph 10 is located on the Kerr-McGee facility near the northeast corner of cemetery property. The view in Photograph 10 is north and the well a flush mount well located between the utility pole and the stacks of untreated wood.

The facility has two wells located on school property located to the southwest of the facility property. The wells were located on the edge of the school playground. The school recently added parking in this area. The drive for the parking lot can be seen in Photograph 11. In building the drive, the school has apparently covered monitoring well CMW-63.

The facility maintains documentation of RCRA personnel training. The date of the most recent training was October 1994. Financial assurance for post-closure and corrective action is provided through a financial test. The most recent financial test was submitted in March of 1995 and provides \$192,053 for post-closure activities and \$719,087 for corrective action activities. These figures were adjusted from the previous years financial assurance.

The facility submits semiannual reports to the Executive Director on the effectiveness of the corrective action program. The most recent report was submitted in March 1995. These reports have been found to meet the facility's permit requirements. The next semiannual report is due in October 1995.

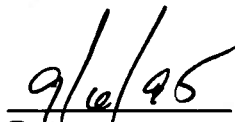
10. Conclusions

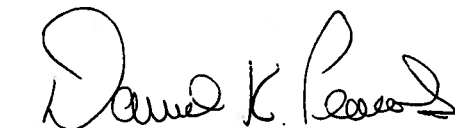
No apparent violations were found on the day of the inspection. The following comments were, however, compiled as a result of the inspection:

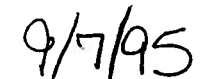
1. Monitoring well CMW-63 should be located. If the condition of the well is such that it can no longer be used, the well should be properly abandoned as outlined in Attachment IV-4 of the facility's Hazardous Waste Management Permit No. HW-90-329-01.
2. The roll-off box used for the storage of hazardous waste at the facility was viewed as meeting the requirements of a container storage area. Documentation of the inspection of this area in accordance with MHWMR 265.174 was not requested of the facility on the day of the inspection. The facility should notify the Office as to whether this inspection is being performed.

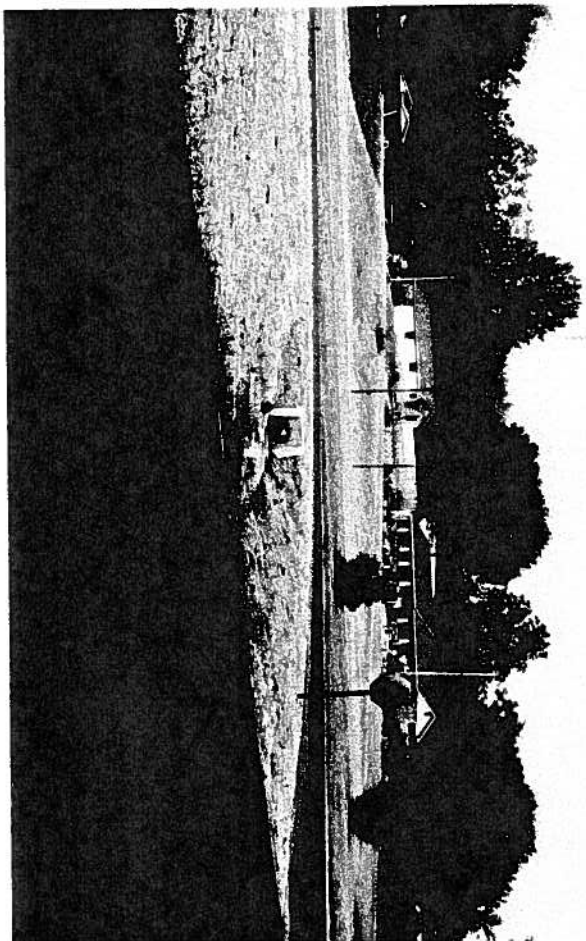
11. Signatures


Bruce Ferguson, Inspector

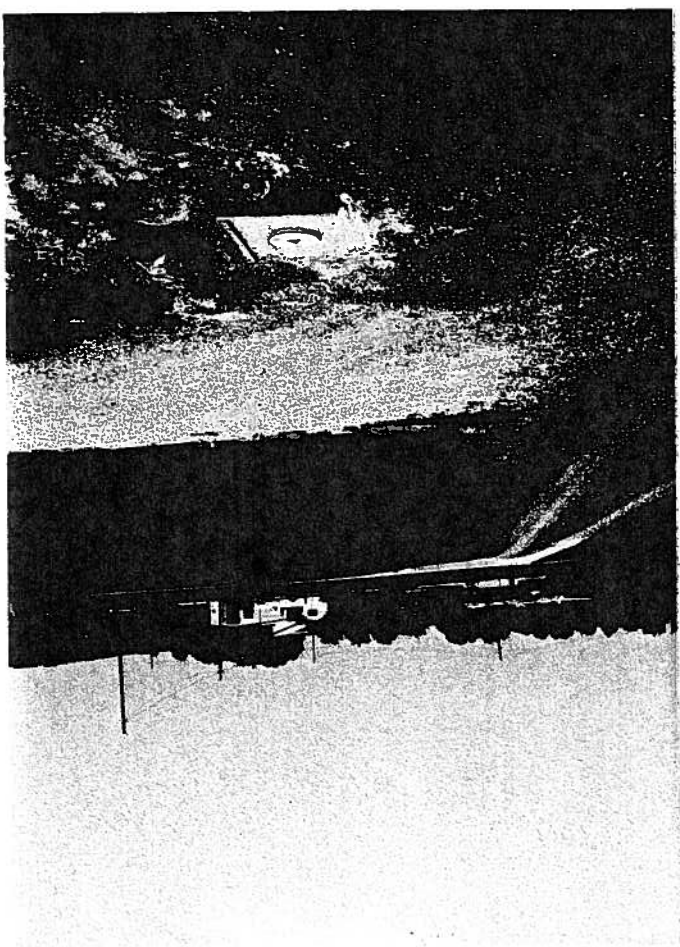

Date


David Peacock, Supervisor


Date

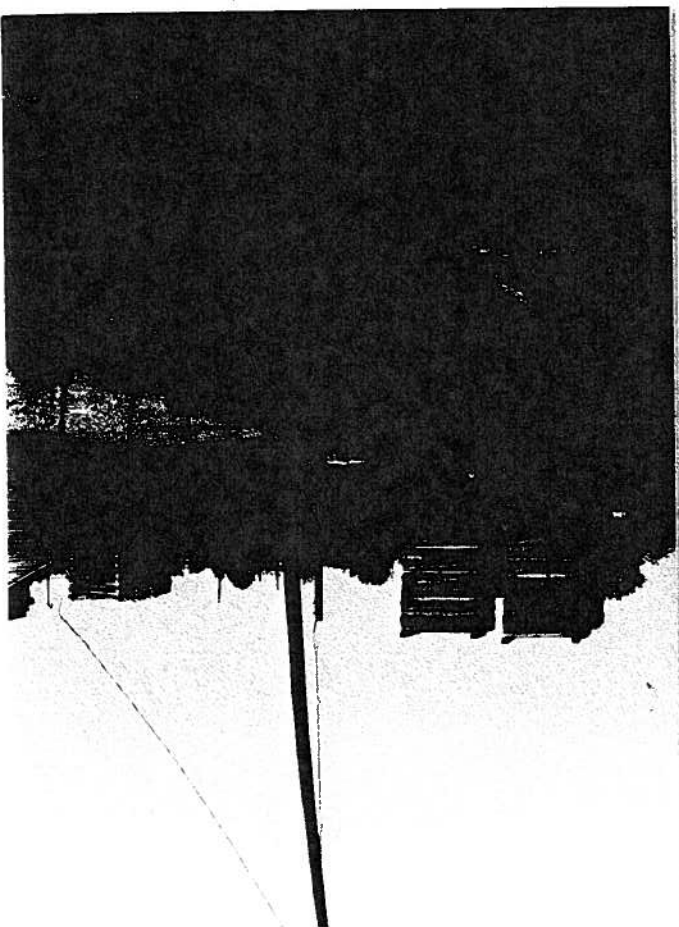


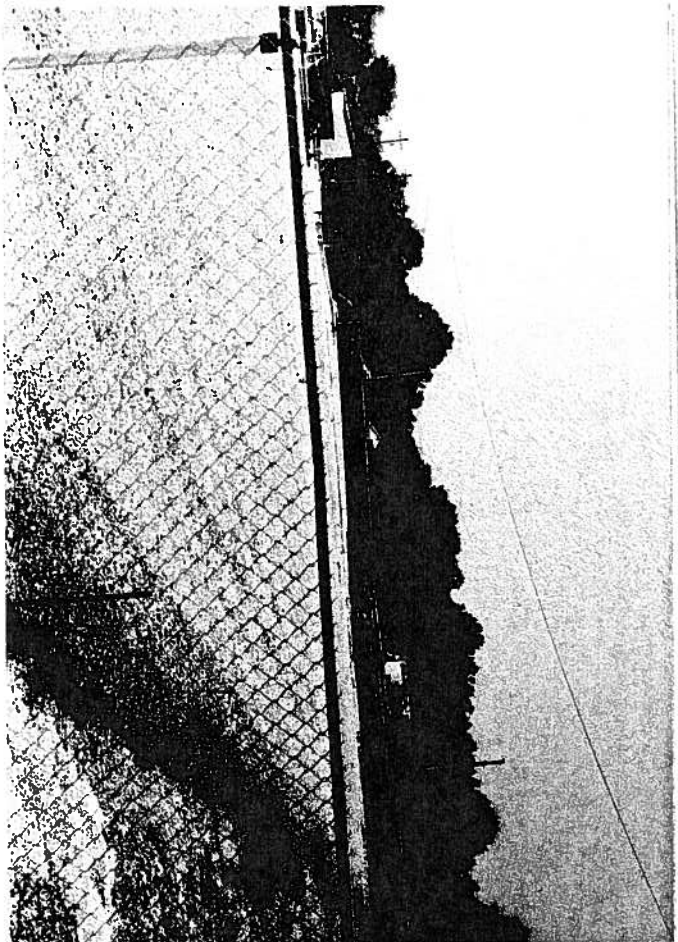
PHOTOGRAPH 11 ↓



PHOTOGRAPH 9 ↓

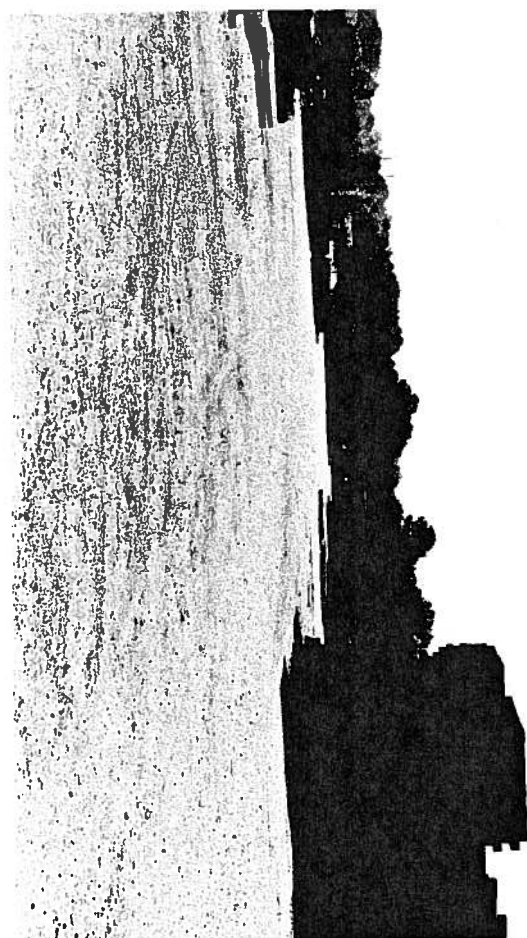
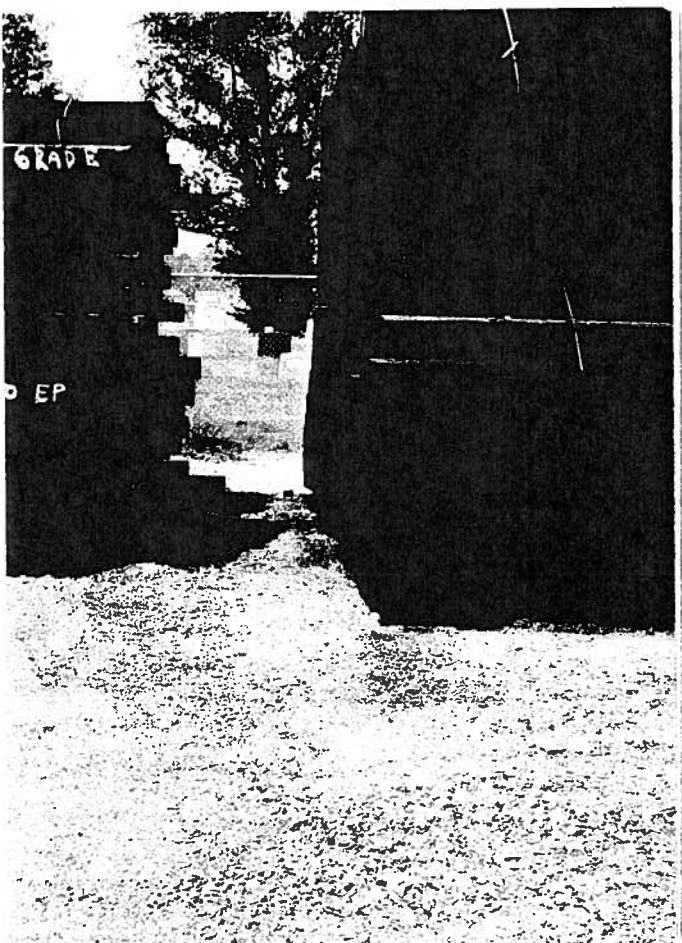
PHOTOGRAPH 10 ↓





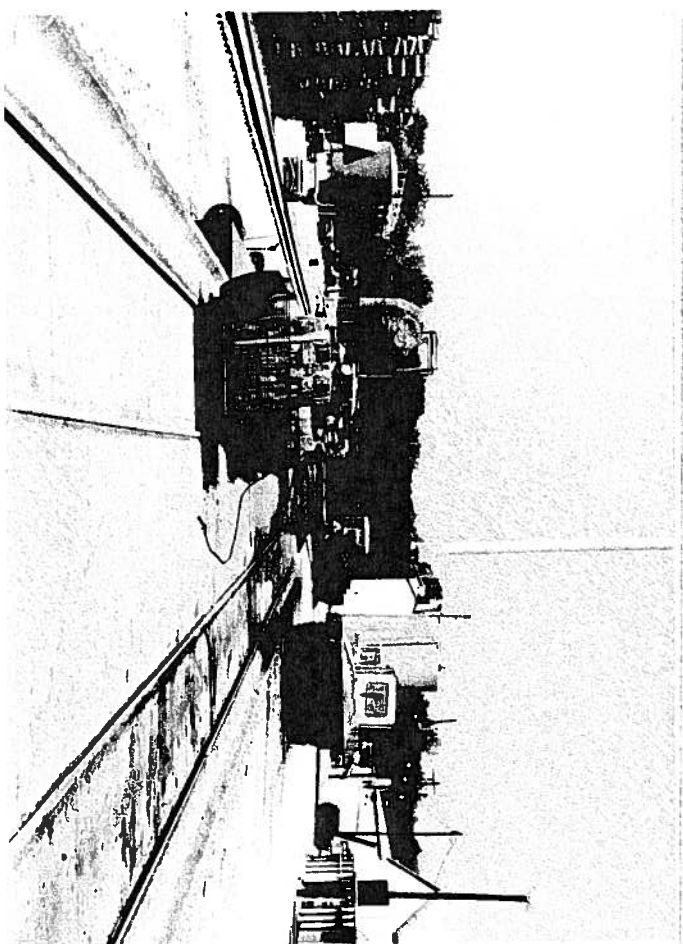
PHOTOGRAPH 1 ↓

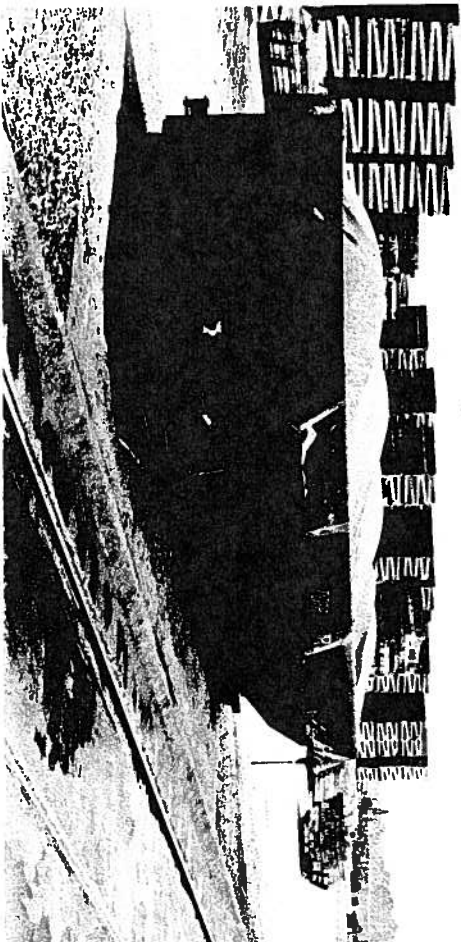
PHOTOGRAPH 3 ↓



PHOTOGRAPH 2 ↓

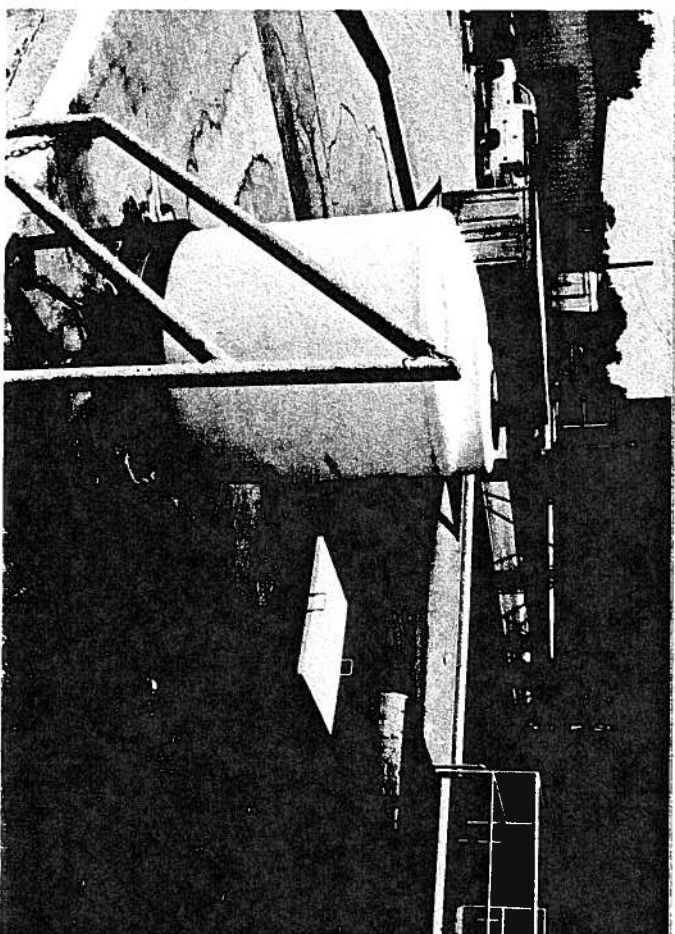
PHOTOGRAPH 4 ↓





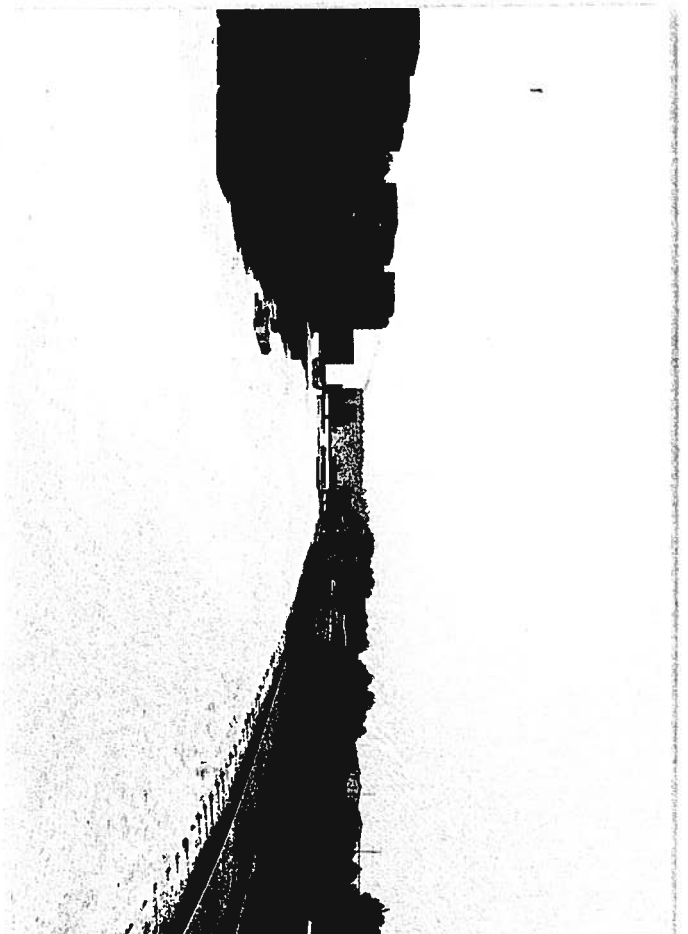
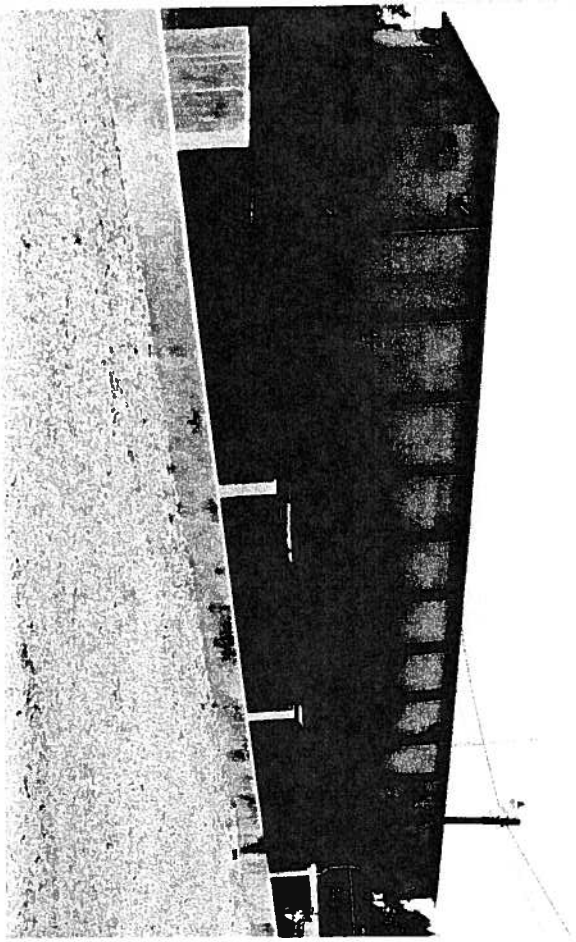
PHOTOGRAPH 5 ↓

PHOTOGRAPH 7 ↓



PHOTOGRAPH 6 ↓

PHOTOGRAPH 8 ↓



Appendix IV

Inspection Checklists

CHECKLISTS	PAGE
1. General Site Inspection Information Form.....	IV-2
2. General Facility Checklist.....	IV-3
3. Air Emissions Checklist.....	IV-10
4. Containers Checklist.....	IV-31
5. Generators Checklist.....	IV-32
6. Ground-Water Monitoring Checklist.....	IV-38
7. Health & Safety Checklist.....	IV-45
8. Incinerator Checklist.....	IV-58
9. Land Disposal Restrictions Checklist.....	IV-80
10. Landfills Checklist.....	IV-115
11. Land Treatment Checklist.....	IV-119
12. Surface Impoundments Checklist.....	IV-125
13. Thermal Treatment Checklist.....	IV-130
14. Transporters Checklist.....	IV-133
15. Waste Information Checklist.....	IV-136
16. Waste Piles Checklist.....	IV-140

1. General Site Inspection Information Form

KERR-McGEE CHEMICAL CORPORATION 2300 14th Ave & 20th St. N
 A. SITE NAME B. STREET (or other identifier)
Columbus MS 39701 Lowndes
 C. CITY D. STATE E. ZIP CODE F. COUNTY NAME

G. SITE OPERATOR INFORMATION

1. Name Kerr-McGee Chemical Corp 2. Telephone Number
 3. Street 2300 14th Ave & 20th St N 4. City Columbus 5. State MS 6. Zip Code 39701
 7. Facility Contact/Telephone No. Chuck Swann 8. Responsible Official/Telephone No. Tony Helms

H. SITE DESCRIPTION**I. TYPE OF OWNERSHIP**

☐ 1. Federal ☐ 2. State ☐ 3. County ☐ 4. Municipal ☒ 5. Private

J. FUNCTION

☒ 1. Generator ☐ 2. Transporter ☐ 3. Treatment ☐ 4. Storage ☒ 5. Disposal

K. REGULATORY STATUS

☐ 1. Interim Status ☐ 3. Part B Permit Application Submitted
☒ 2. Permitted Facility ☐ 4. Part B Permit Application in Preparation

L. INSPECTOR INFORMATION

1. Principal Inspector Name BRUCE FERGUSON 3. Organization MS DEQ
 2. Title EET II 4. Telephone No. (area code and No.) (601) 961-5141

M. INSPECTION PARTICIPANTS

1.	6.
2.	7.
3.	8.
4.	9.
5.	10.

2. General Facility Checklist

Section A - General Facility Standards (40 CFR 284.5 Subpart B)

Yes No

1. Does facility have EPA Identification No.? (§§264/5.11)
a. If yes, EPA I.D. No. MSD 99086329
If no, explain. _____
2. Has facility received hazardous waste from a foreign source?
(§§264/5.12)
If yes, has it filed a notice with the Regional Administrator?

X _____

 X

Waste Analysis.

- 3. Does facility maintain a copy of the waste analysis plan on-site? (§§264/5.13)**
- a. If yes, does it include:**
- 1. Parameters for which each waste will be analyzed? (§§264/5.13(b)(1))**
 - 2. Test methods used to test for these parameters? (§§264/5.13(b)(2))**
 - 3. Sampling method used to obtain sample? (§§264/5.13(b)(3))**
 - 4. Frequency with which the initial analyses will be reviewed or repeated? (§§264/5.13(b)(4))**
 - 5. (For off-site facilities) waste analyses that generators have agreed to supply? (§§264/5.13(b)(5))**
 - 6. (For off-site facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including: (§§264/5.13(c))**
 - a. Procedures to be used to determine the identity of each movement of waste**
 - b. Sampling method to be used to obtain representative sample of the waste to be identified.**

- | | | Yes | No |
|----------------|--|-----|----|
| 4. | Does the facility provide adequate security through:
(§§264/5.14) | | |
| a. | 24-hour surveillance system (e.g., television monitoring or guards)? | — | — |
|
<u>OR</u> | | | |
| b. | 1. Artificial or natural confining barrier around facility (e.g., fence or fence and cliff)?
(§§264/5.14(b))
Describe: | X | — |
|
<u>AND</u> | | | |
| | 2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)?
(§§264/5.14(b)(2)(ii))
Describe: | X | — |

General Inspection Requirements

- | | | | |
|----|---|---|---|
| 5. | Does the owner/operator maintain a written schedule at the facility for inspecting: (§§264/5.15) | | |
| a. | Monitoring equipment? | — | — |
| b. | Safety and emergency equipment? (§§264/5.15(b)) | — | — |
| c. | Security devices: | — | — |
| d. | Operating and structural equipment? | — | — |
| e. | Types of problems with equipment: | | |
| | 1. Malfunction (§§264/5.15(a)) | — | — |
| | 2. Operator error | — | — |
| | 3. Discharges | — | — |
| 6. | Does the owner/operator maintain an inspection log?
(§§264/5.15(d)) | — | — |
| a. | If yes, does it include: | | |
| | 1. Date and time of inspection? | — | — |
| | 2. Name of inspector? | — | — |
| | 3. Notation of observations? | — | — |
| | 4. Date and nature of repairs or remedial action? | — | — |
| b. | Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.)
(§§264/5.15(c)) | | |

Personnel Training

Yes No

7. Does the owner/operator maintain personnel training records at the facility? (§§264/5.16)
How long are they kept? Indefinite

X —

a. If yes, do they include:

1. Job title and written job description of each position? (§§264/5.16(d))
2. Description of type and amount of training?
3. Records of training given to facility personnel?

X —
X —
X —

Requirements for Ignitable, Reactive, or Incompatible Waste

8. Does facility handle ignitable or reactive wastes? (§§264/5.17)

— X

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

— —

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flame confined to specifically designated locations?

— —

c. Are "No Smoking" signs posted in hazardous areas?

— —

d. Are precautions documented (Part 264 only)? (§264.17(c))

— —

9. Are containers leaking or corroding? (§§264/5.171)

— —

10. Is there evidence of heat generation from incompatible wastes?

— —

Section B - Preparedness and Prevention (40 CFR 264.5 Subpart C)

1. Is there evidence of fire, explosion, or contamination of the environment?

— X

If yes, use narrative explanation sheet to explain.

2. Is the facility equipped with: (§§264/5.32)

a. Internal communication or alarm system?

X —

- (i) Is it easily accessible in case of emergency? (§§264/5.34)

X —

- | | Yes | No |
|--|------------|----|
| b. Telephone or two-way radio to call emergency response personnel? (§§264/5.32(b)) | <u>X</u> | — |
| c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? (§§264/5.32(c)) | <u>X</u> | — |
| d. Water of adequate volume for hoses, sprinklers, or water spray system? (§§264/5.32(d))
Describe source of water: <i>city of houston</i> | <u>X</u> | — |
| 3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (§§264/5.35) | <u>X</u> | — |
| 4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (§§264/5.37) | <u>X</u> | — |
| 5. In the case that more than one police or fire department might respond, is there a designated primary authority? (§§264/5.37(a)(2)) | <u>N/A</u> | — |
| a. If yes, name primary authority: | | |
| 6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? (§§264/5.37(a)(3)) | <u>X</u> | — |
| a. Are they readily available to all personnel? | — | — |
| 7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (§§264/5.37(a)(4)) | <u>X</u> | — |
| 8. If State or local authorities decline to enter into the arrangements called for under §§264/5.37, is this entered in the operating record? (§§264/5.37(b)) | <u>N/A</u> | — |

Section C - Contingency Plan and Emergency Procedures
(40 CFR 264/5 Subpart D)

- | | | |
|---|----------|---|
| 1. Is a contingency plan maintained at the facility? (§§264/5.51) | <u>X</u> | — |
| a. If yes, is it a revised SPCC Plan? (§§264/5.52(b)) | <u>X</u> | — |
| b. Does contingency plan include: | | |
| 1. Arrangements with local emergency response organizations? (§§264/5.52(c)) | <u>X</u> | — |
| 2. Emergency coordinator's names, phone numbers, and addresses? (§§264/5.52(d)) | <u>X</u> | — |
| 3. List of all emergency equipment at facility and descriptions of equipment? (§§264/5.52(e)) | <u>X</u> | — |
| 4. Evacuation plan for facility personnel? (§§264/5.52(f)) | <u>X</u> | — |

- | | Yes | No |
|--|-------------------------------------|--------------------------|
| 2. Is there an emergency coordinator on site or on call at all times? (§§264/5.55) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Section D - Manifest System Recordkeeping and Reporting
(40 CFR 264/5 Subpart E)

- | | | |
|---|-------------------------------------|-------------------------------------|
| 1. Does facility receive waste from off-site? (§§264/5.71(a)) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a. If yes, does the owner/operator retain copies of all manifests? | <input type="checkbox"/> | <input type="checkbox"/> |
| 1. Are the manifests signed and dated and returned to the generator? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Is a signed copy given to the transporter? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? (§§264/5.71(b)) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a. If yes, is it accompanied by a shipping paper? | <input type="checkbox"/> | <input type="checkbox"/> |
| 1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Is a signed copy given to the transporter? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (§§264/5.72) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? | <input type="checkbox"/> | <input type="checkbox"/> |
| 1. If no, has Regional Administrator been notified? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Does the owner/operator keep a written operating record at the facility? (§§264/5.73(a)) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. If yes, does it include: (§§264/5.73(b))		Yes	No
1.	Description and quantity of each hazardous waste received?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	Methods and dates of treatment, storage, and disposal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.	Location and quantity of each hazardous waste at each location?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.	Cross-references to manifests/shipping papers?	<input type="checkbox"/>	<input type="checkbox"/>
5.	Records and results of waste analyses?	<input type="checkbox"/>	<input type="checkbox"/>
6.	Report of incidents involving implementation of the contingency plan?	<input type="checkbox"/>	<input type="checkbox"/>
7.	Records and results of required inspections?	<input type="checkbox"/>	<input type="checkbox"/>
8.	Monitoring or testing analytical data? (Part 264)	<input type="checkbox"/>	<input type="checkbox"/>
9.	Closure cost estimates and, for disposal facilities, post-closure cost estimates? (Part 264)	<input type="checkbox"/>	<input type="checkbox"/>
10.	Notices of generators as specified? (§264.12(b))	<input type="checkbox"/>	<input type="checkbox"/>
11.	Certification of permittee waste minimization program? (§264.73(b)(9))	<input type="checkbox"/>	<input type="checkbox"/>
12.	Land disposal restriction records required by §268.5, §268.6, §268.7(a), and §268.8, as applicable? (§264.73(b)(10)-(16))	<input type="checkbox"/>	<input type="checkbox"/>
5.	Does the facility submit a biennial report by March 1 every even-numbered year? (§§264/5.75)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a. If yes, do reports contain the following information:			
1.	EPA I.D. number? (§§264/5.75(a))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	Date and year covered by report? (§§264/5.75(b))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.	Description/quantity of hazardous waste? (§§264/5.75(d))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.	Treatment, storage, and disposal methods? (§§264/5.75(e))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.	Monitoring data under §265.94(a)(2) and (b)(2)? (§265.75(f))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.	Most recent closure and post-closure cost estimates? (§§264/5.75(g))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.	For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? (§§264/5.75(h))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8.	Certification signed by owner/operator? (§§264/5.75(j))	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.	Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (§§264/5.76)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- | | | Yes | No |
|----|--|-------------------------------------|----|
| a. | If yes, has he submitted an unmanifested waste report to the Regional Administrator? | — | — |
| 7. | Does the facility submit to the Regional Administrator reports on releases, fires, and explosions; contamination and monitoring data; and facility closure? (§§264/5.77) | <input checked="" type="checkbox"/> | — |

3. Air Emissions Checklist

Section A - Applicability (§§264/5.1030)

- | | Yes | No |
|--|-----|----|
| 1. Does the facility have units permitted under Part 270 or is it permitted under Part 270? | — | — |
| a. What is the effective date for this facility? _____ | | |
| b. For interim status facilities, have these requirements been incorporated into Part B application submittal? | — | — |
| 2. Are there any of the following separation processes at the facility: | | |
| a. Distillation? | — | — |
| b. Fractionation? | — | — |
| c. Thin-film evaporation? | — | — |
| d. Solvent extraction? | — | — |
| e. Air stripping? | — | — |
| f. Steam stripping? | — | — |

Section B - Waste Streams

- | | | |
|--|---|---|
| 3. Are there waste streams associated with any separation processes that contain 10 ppmw or greater organic concentration? (§§264/5.1032(a)) | — | — |
| a. If they claim waste streams below 10 ppmw, did they use proper means to determine concentration? (§§264/5.1034(d)(1 or 2)) | — | — |
| b. Was date of initial determination before their effective date? (§§264/5.1034(e)) | — | — |
| c. Were other analyses performed annually or upon changes in waste streams? (§§264/5.1034(e)(2 or 3)) | — | — |

Section C - Facility Emissions Rates

- | | | |
|--|---|---|
| 4. Is the hourly process vent organic emission rate greater than or equal to 3 lb/hr? (§§264/5.1032(a)) | — | — |
| Is the yearly process vent organic emission rate greater than or equal to 3.1 tons/yr? (§§264/5.1032(a)) | — | — |

4. Containers Checklist**Section A - Use and Management (§§264/5.171)**

Yes No

1. Are containers in good condition?

☒ ☐**Section B - Compatibility of Waste With Container (§§264/5.172)**

1. Is container made of a material that will not react with the waste which it stores?

☒ ☐**Section C - Management of Containers (§§264/5.173)**

1. Is container always closed while holding hazardous waste?
2. Is container not opened, handled, or stored in a manner which may rupture it or cause it to leak?

☒ ☐
☐ ☒**Section D - Inspections (§§264/5.174)**

1. Does owner/operator inspect containers at least weekly for leaks and deterioration?

☐ ☐**Section E - Containment (§264.175)**

1. Do container storage areas have a containment system?

☐ ☒**Section F - Ignitable and Reactive Waste (§§264/5.176)**

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines?

☐ ☒**Section G - Incompatible Waste (§§264/5.177)**

1. Are incompatible wastes or materials placed in the same containers?
2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?
3. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?

☐ ☒
☐ ☒
☐ ☒**Section H - Closure (§264.178)**

1. At closure, were all hazardous wastes and associated residues removed from the containment system?

☐ ☒

5. Generators Checklist**Section A - EPA Identification No.**

- | | Yes | No |
|--|-------------------------------------|--------------------------|
| 1. Does generator have EPA I.D. No.? (§262.12) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a. If yes, EPA I.D. No. _____ | | |

Section B - Manifest

- | | | |
|--|-------------------------------------|--------------------------|
| 1. Does generator ship waste off-site? (§262.20) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a. If no, do not fill out Sections B and D. | | |
| b. If yes, identify primary off-site facility(s). Use narrative explanation sheet. <i>Chem waste</i> | | |
| 2. Does generator use manifest? (§262.20) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month?) | <input type="checkbox"/> | <input type="checkbox"/> |

NOTE: SQGs are only exempt if wastes are reclaimed. (See §262.20(e).)

- | | | |
|---|-------------------------------------|--------------------------|
| 1. If yes, does generator indicate this when sending waste to a TSD facility? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|-------------------------------------|--------------------------|

		Yes	No
b.	If yes, does manifest include the following information? (Part 262 appendix)		
1.	Manifest document no.	X	—
2.	Generator's name, mailing address, telephone no.	X	—
3.	Generator EPA I.D. no.	X	—
4.	Transporter Name(s) and EPA I.D. no.(s)	X	—
5.	a. Facility name, address, and EPA I.D. no.	X	—
	b. Alternate facility name, address, and EPA I.D. no.	X	—
	c. Instructions to return to generator if undeliverable	X	—
6.	Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number)	X	—
7.	Emergency information (optional) (special handling instructions, telephone no.)	X	—
8.	Is the following certification on each manifest form?	X	—
	"This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable national and international regulations."	X	—
9.	Does generator retain copies of manifests? (§262.40)		
	If yes, complete a through e. (§262.23)		

- | | | Yes | No |
|----|--|----------|----|
| a. | 1. Did generator sign and date all manifests? | <u>X</u> | — |
| | 2. Who signed for generator? | | — |
| | Name _____ Title _____ | | |
| b. | 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? | <u>X</u> | — |
| | 2. Who signed and dated for transporter? (§262.23) | | — |
| | Name _____ Title _____ | | |
| c. | Does generator retain one copy of manifest signed by generator and initial transporter? (§262.40) | <u>X</u> | — |
| d. | Do returned copies of manifest include facility owner/operator signature and date of acceptance? (§262.40) | <u>X</u> | — |
| e. | Does generator retain copies for 3 years? (§262.40) | <u>X</u> | — |

Section C - Hazardous Waste Determination (40 CFR 262.11)

- | | | | |
|----|---|---|---|
| 1. | Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? | — | — |
| a. | If yes, list wastes and quantities (include EPA Hazardous Waste No.) _____ | | |
| 2. | Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity)? | — | — |
| a. | If yes, list wastes and quantities (include EPA Hazardous Waste No.) _____ | | |
| b. | Does generator determine characteristics by testing or by applying knowledge of processes? _____ | | |

- | | Yes | No |
|--|-----|----|
| 1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? | — | — |
| a. If equivalent test methods used, attach copy of equivalent methods used. | | |
| 3. Are there any other solid wastes generated by generators? | — | — |
| a. If yes, did generator test all wastes to determine whether or not they were hazardous? | — | — |
| 1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary) | | |

Section D - Pretransport Requirements

- | | | |
|---|-----|---|
| 1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (§262.30) | X | — |
| 2. a. Are containers to be shipped leaking or corroding? | — | X |
| b. Use additional sheet to describe containers and condition. | | |
| c. Is there evidence of heat generation from incompatible wastes in the containers? | — | X |
| 3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? (§262.31) | X | — |
| 4. Does generator mark each package in accordance with 49 CFR 172? (§262.32) | X | — |
| 5. Is each container of 110 gallons or less marked with the following label? (§262.32) | h/r | |

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

Manifest document No. _____

- | | | |
|---|---|---|
| 6. Does generator have placards to offer to transporters? (§262.33) | — | — |
|---|---|---|

- | | Yes | No |
|--|-------------------------------------|-------------------------------------|
| 7. Accumulation time (§262.34) | — | <input checked="" type="checkbox"/> |
| a. Are containers used to temporarily store waste before transport? | | |
| 1. If yes, is each container clearly dated: Also, fill out rest of No. 7 (accum. time) (§262.34(a)(2)) | — | — |
| b. 1. Does generator inspect containers for leakage or corrosions? (§265.174 - Inspections) | — | — |
| 2. If yes, with what frequency? | — | — |
| c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 Feet) from the facility's property line? (§265.176 - Special Requirements for Ignitable or Reactive Wastes) | <input checked="" type="checkbox"/> | — |
| NOTE: If tanks are used, fill out checklist for tanks. (See RCRA Hazardous Waste Tank Systems Inspection Manual, OSWER Dir. No. 9938.4) | | |
| d. Are the containers labeled and marked in accordance with Sections D-3, -4, and -5 of this form? | — | — |
| NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D. | | |
| e. Does generator comply with requirements for personnel training? (Attach checklist for §265.16 - Personnel Training.) | <input checked="" type="checkbox"/> | — |
| 8. Describe storage area. Use photos and narrative explanation sheet. | | |

Section E - Recordkeeping and Records (40 CFR 262.40)

- | | | |
|---|-------------------------------------|---|
| 1. Does generator keep the following reports for 3 years? | | |
| a. Manifest or signed copies from designated facilities | <input checked="" type="checkbox"/> | — |
| b. Biennial reports | <input checked="" type="checkbox"/> | — |
| c. Exception reports | <input checked="" type="checkbox"/> | — |
| d. Test results | <input checked="" type="checkbox"/> | — |
| 2. Where are the records kept (at facility or elsewhere)? | — | — |
| 3. Who is in charge of keeping the records? | | |

Name Chuck Swann Title _____

Section F - Special Conditions

1. Has the primary exporter received from or transported to a foreign source any hazardous waste?
- a. If yes, has he filed a notice with the Regional Administrator? (§262.53)
- b. Is this waste manifested and signed by a foreign consignee? (§262.54)
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? (§262.54)

Yes	No
<u> H </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

6. Ground-Water Monitoring Checklist

Section A - Monitoring System (40 CFR Parts 264/5 Subpart F)

	Yes	No
1. Does the facility have a ground-water monitoring system in operation? (§265.90)	X	—
a. If yes, does the system consist of: (§265.91)		
1. Minimally one upgradient monitoring well? (Part 265)	X	—
2. Minimally three downgradient monitoring wells? (Part 265)	X	—
b. Are monitoring wells cased so that the integrity of the boreholes is maintained? (§265.91)	X	—
c. Is a compliance monitoring system installed whenever hazardous waste constituents are detected at the compliance point? (§264.92)	X	—
d. Is a corrective-action program initiated whenever the ground-water protection standard is exceeded? (§264.100(c))	X	—
e. Is a detection monitoring program instituted in all other cases? (§264.98)	X	—
2. Does the facility have a monitoring and response program? (Part 264)	—	—
a. If yes, is a compliance monitoring system instituted whenever hazardous constituents are detected at the compliance point? (§264.99)	X	—
b. Whenever the ground-water protection standard is exceeded, does facility institute a corrective-action program? (§264.99)	X	—
c. In all other cases, does the facility institute a detection monitoring program? (§264.99)	X	—

Section B - Sampling and Analysis (40 CFR 265.92)

1. Does the facility obtain and analyze samples from the ground-water monitoring system? (§265.92(a))	X	—
2. Has facility developed and followed a ground-water sampling and analysis plan? (§265.92(a))	X	—

Section E - General Requirements

Yes No

1. Does facility comply with the following requirements? (§264.97)
 - a. Are sufficient wells installed at appropriate locations and depths? ☒ ☐
 - b. Have sampling and analysis techniques been consistent? ☒ ☐
 - c. Have ground-water elevation data been recorded? ☒ ☐
 - d. Have background concentrations been determined? ☒ ☐

2. If ground water is monitored to satisfy requirements of §265.93(d) (4), owner/operator must:
 - a. Keep records of the analyses and evaluations specified in the plan throughout the facility's active life, and, for disposal facilities, throughout post-closure. ☒ ☐
 - b. Report the following ground-water monitoring information:
 1. During the first year when initial background concentrations are being determined, did owner/operator submit values within 15 days after completing analysis? ☐ ☐
 2. If yes, did owner/operator also submit an identification of any parameters whose concentrations exceed maximum levels in Appendix III? ☐ ☐
 3. (Annually) Did owner/operator report concentrations or values of the parameters listed in §265.93(b)(2) for each well, along with required evaluations for these parameters under §265.93(b)? ☐ ☐
 4. Did owner/operator also separately identify any significant differences from initial background concentrations for upgradient wells? ☐ ☐
 5. Did owner/operator report on the results of ground-water surface elevations (and a description of the results if necessary) by March 1 of the following year? ☐ ☐

Section F - Detection Monitoring Program (40 CFR 264.98)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases? ☒ ☐
 - a. If yes, are the following components included in the system:

1. Background values?
2. Determination of ground-water flow rate?
3. Determination of ground-water compliance point semiannually?
4. Determination of statistically significant increases over background concentrations?
5. Notification to the Regional Administrator if there was a statistically significant increase?

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Section G - Compliance Monitoring Program (40 CFR 264.99)

1. Does facility operate a compliance monitoring program?
 - a. Does facility determine concentrations of hazardous constituents at least quarterly?
 - b. Does facility determine ground-water flow rate and direction in uppermost aquifer annually? (§264.99(e))
 - c. Does facility analyze samples for Appendix IX constituents annually? (§264.99(g))
 - d. Does facility make statistically significant increases over background values? (§264.99(h))
 - e. If there is an increase, does facility notify the Regional Administrator and establish a corrective-action program? (§264.99(h))

<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Section H - Corrective Action Program (40 CFR 264.100)

1. Does facility follow a corrective-action program that meets the facility's permit requirements?

<input checked="" type="checkbox"/>	<input type="checkbox"/>
-------------------------------------	--------------------------

* See RCRA Ground-Water Monitoring Systems (OSWER Directive Nos. 9950.2, 9950.3, 9950.4)

A-Applicability 265.440	Yes	No
1. Does the owner/operator maintain a new or existing drip pad to convey treated wood drippage, precipitation, and/or surface water run-off to an associated collection system?	<u>X</u>	<u> </u>
a. Was the drip pad constructed prior to December 6, 1990?	<u>X</u>	<u> </u>
b. Is the drip pad inside or under a structure that provides protection from precipitation?	<u> </u>	<u>X</u>
c. Does the facility maintain and comply with a written contingency plan for infrequent and incidental drippage that describes how the facility will do the following:	<u> </u>	<u> </u>
1. Clean up the drippage?	<u> </u>	<u> </u>
2. Document the cleanup of the drippage?	<u> </u>	<u> </u>
3. Retain documents regarding cleanup for three years?	<u> </u>	<u> </u>
4. Manage the contaminated media in a manner consistent with Federal regulations?	<u> </u>	<u> </u>

B - Design and operating requirements 265.443	Yes	No
1. Is the drip pad constructed as follows:		
a. Is the drip pad constructed of non-earthen materials, excepting wood and non-structurally supported asphalt?	<u>X</u>	<u> </u>
b. Is the drip pad sloped to free-drain treated wood drippage to the associated collection system?	<u>X</u>	<u> </u>
c. Does the drip pad have a curb or berm around the perimeter?	<u> </u>	<u> </u>
d. 1. Does the drip pad have a hydraulic conductivity of less than or equal to 10 ⁻⁷ cm/s?	<u>X</u>	<u> </u>
2. Does the owner maintain on file at the facility a written assessment of the drip pad certified by an independent, qualified registered professional engineer? Is the assessment reviewed, updated and recertified annually? <u>December 29, 1994</u>	<u>X</u>	<u> </u>
e. Is the drip pad of sufficient structural strength and thickness to prevent failure?	<u>X</u>	<u> </u>
If the drip pad complies with 1.d. then skip to 5.		
2. Is the drip pad constructed with a synthetic liner?	<u> </u>	<u>X</u>

Drip pad is scheduled to be recoated next week.

B - Design and operating requirements 265.443	Yes	No
3. Is there a leakage detection system in place that:		
a. Is constructed of materials that are chemically resistant to the managed waste and of sufficient strength to prevent collapse?	___	___
b. Is designed and operated to function without clogging?	___	___
c. Is designed to detect a release of hazardous waste?	___	___
4. Does the drip pad have a leakage collection system immediately above the liner?	___	___
5. Is the drip pad maintained free of cracks, gaps, corrosion, or other deterioration?	___	___
6. Is the drip pad designed to prevent run-off?	___	___
7. Is the drip pad designed to prevent run-on during a 24-hr 25 yr. storm or is the system capacity sufficient to contain any run-on that may enter the system?	___	___
8. Is drippage and accumulated precipitation removed from the associated collection system as necessary to prevent overflow onto the drip pad?	___	___
9. Is the drip pad cleaned at least weekly and the cleaning and cleaning procedure documented?	___	___
10. Is treated material held on the drip pad until drippage has ceased?	___	___

C - Inspections 265.444	Yes	No
1. Is the drip pad inspected weekly and after storms to detect:		
a. Deterioration, malfunctions or improper operation of run-on and run-off control systems?	___	___
b. The presence of leakage in and proper function of leakage detection system?	___	___
c. Deterioration or cracking of the drip pad surface?	___	___

RCRA Operating & Maintenance Inspection

FILE COPY

1. Inspector and Author of Report

Bruce Ferguson, Environmental Scientist III
Mississippi Office of Pollution Control

2. Facility Information

Kerr-McGee Chemical Corporation
Forest Products Division
P. O. Box 906
Columbus, Mississippi 39701
MSD990866329

3. Responsible Company Official

John Getz, Plant Manager
Kerr-McGee Chemical Corporation

4. Inspection Participants

Bruce Ferguson, MOPC
Tony Helms, KMCC
Bud Klutey, KMCC
Danny Price, KMCC

5. Date and Time of Inspection

May 5, 1993, 8:00 a.m., CST

6. Applicable Requirements

Mississippi Hazardous Waste Management Regulations (MHWMR)
Parts 262, 264, 268 and the facility's Hazardous Waste Post-Closure Permit (MHWMP) No. HW-90-139-01.

7. Facility Description

The site now occupied by Kerr-McGee chemical Corporation (KMCC) has been used as a wood treating facility since 1928. KMCC acquired the site in 1964 and continues to produce treated railroad ties, switch ties, crossings, and pilings using creosote as a preservative. Pentachlorophenol was also used as a preservative prior to 1976.

The facility is permitted to conduct post-closure and groundwater corrective action activities. In June of 1986, KMCC certified closure of two hazardous waste surface impoundments, an aeration basin and a sedimentation basin in which bottom sediment sludge from process wastewater accumulated. The surface impoundments were replaced by upgrading production process oil/water separators to recycle preservatives for re-application within the production

process. The wastewater is then pumped to the wastewater treatment system which operates under a pre-treatment permit and is discharged to the City of Columbus POTW.

Presently the groundwater corrective action system consists of 12 groundwater recovery wells and two recovery trenches. Recovered groundwater is pumped to the process oil/water separator and on to the wastewater treatment system.

In 1988, KMCC installed a concrete drip track to collect excess preservative dripping from treated wood after removal from the pressure cylinder. In December of 1991, the drip track was certified by a professional engineer that the track met the requirements of 40 CFR 264.571. Wastes generated from the drip track are being handled as F034 wastes, however, are not technically F034 waste since Mississippi has not adopted the wood treating regulations.

Currently there are no hazardous wastes generated at the facility. Upon adoption of the wood treating regulations by the State of Mississippi, the facility will generate F034 waste.

9. Findings

The Sampling and Analysis Plan and the financial documents were reviewed prior to the inspection. The financial assurance is provided by a financial test and was found to be in order. The Sampling and analysis plan is essentially the same document as the Sampling and Analysis Plan for the Meridian facility. As mentioned in the inspection report for that facility, the Sampling and Analysis Plan does not contain provisions for collecting samples in the order of volatilization potential and decision criteria to be used to replace or repair sampling equipment and monitoring wells.

The measurement of the water levels in the monitoring wells were taken on the day prior to the inspection. These measurements were therefore not witnessed. The results of these measurements were provided on the day of the inspection. The inspector's interpretation of the potentiometric surface using the levels provided can be seen in Attachment A as Exhibit 1. This interpretation is consistent with the potentiometric maps provided in "1992 Annual/Semi-Annual Corrective Action Performance Evaluation and Groundwater Monitoring Report, Columbus, Mississippi" for previous sampling events.

The inspection began with the observation of the sampling of monitoring wells CME-4, CMW-6 and CMW-7. These wells were the first wells sampled. The wells were purged of three well casing volumes prior to being sampled. The volume of water to be purged was determined using Table 2 of the "Sampling and Analysis Plan". The purged water was collected in 55 gallon

drums for treatment in the facility's wastewater treatment system.

The purging as well as the sampling of the monitoring wells was done by bailing using a dedicated stainless steel bailer. The bailers were bottom seat ball valve bailers which are stored inside the monitoring well casings. The bailers were lowered into the well using teflon coated wire which was connected to a nylon rope. It was noticed that the teflon was worn and the wire exposed on the wells for which sampling was observed. The bailers were lowered slowly into the well so as to minimize agitation. As the bailer rope was withdrawn from the well it was stored in a lined garbage can to prevent contact with any surfaces which may have contaminated the rope. The liner was changed in the garbage can between wells to prevent cross contamination. Laytex gloves were worn while purging and sampling and the gloves were changed between wells.

Once the well had been purged of three well casing volumes, it was sampled. In the wells for which sampling was observed, recharge was sufficient to obtain samples immediately after purging the well. Prior to collecting the samples, four cups were filled for measurement of the specific conductance, pH and temperature. The samples were then collected in order of volatilization potential with the volatile samples being collected first and then the base/neutral samples. The volatile samples were collected in 40 ml clear glass vials with teflon coated lids. The volatile vials were prepared prior to the sampling event with HCl as a preservative. The base/neutral samples were collected in one liter amber glass bottles with teflon coated lids. Once collected, the samples were placed in coolers with ice.

Samples were labeled with the following information: facility name, sampling point, test to be conducted, container and preservative. The samples were provided with custody seals and the coolers were bound with tape once full. Once filled, the coolers were stored at the facility's lab until all the samples from the sampling event were collected. The samples were then shipped Airborne the laboratory in Oklahoma City for analysis.

The monitoring wells at the facility were found to have two types of surface completions. Some were flush mount and some had stick up risers. Both types of completions were provided with concrete pads. The riser type completion was provided with a protective surface casing with the well number placed on the surface casing with a magic marker. All of the flush mount wells were not identifiable in the field. All the wells with the riser type completion were found to be locked. The wells with the flush mount completion have the lock inside the manhole cover which is bolted down so these wells were not checked for locks.

All of the monitoring wells were inspected and found to be in good condition. Monitoring well CMW-19 appeared to have been rotated about the riser about 9 degrees. This was apparent by the position of the concrete pad in relation to the indentation in the ground where the pad had previously been.

The closed surface impoundment was inspected and found to be in good condition. The impoundment is fenced, locked and signs are provided from all directions of approach. The cap of the surface impoundment has a gravel covered armored surface rather than a vegetative cover. The armored surface covered the entire area of the surface impoundment. Some erosion was observed at the southwest end of the southernmost boundary of the impoundment. The erosion appeared to be limited to the uppermost layer of the cap and did not extend into the low permeability barrier.

All the required documentation was available at the facility and was found to be in order. These records included inspection records, facility permit, personnel training, groundwater monitoring and the facility permit which contains the contingency plan and the waste analysis plan. Waste manifests were examined. The only shipments of waste over the past year was cleanup from incidental drippage. As mentioned previously, this waste is not a hazardous waste until Mississippi adopts the wood treating regulations, however, these shipments were handled as hazardous wastes and manifest as such. On the day of the inspection the fire department was being given a tour of the facility to familiarize them with the facility and the types of emergencies that might occur there.

Compliance with the Subpart W regulations was not inspected since these regulations are not in effect in Mississippi. As mentioned previously, the facility has installed a drip pad which has been certified to meet the requirements of 40 CFR 264.571. In addition the facility has initiated inspections to comply with the Subpart W regulations. Sample inspection report forms can be seen in Attachment A as Exhibits 2 through 4.

10. Conclusions


The facility was found to be in compliance with the applicable regulations and the facility's post-closure permit on the day of the inspection. Although no violations were found the following situations should be addressed:

1. The Sampling and Analysis Plan should provide for the collection and containerization of samples in the order of volatilization potential. While the sampling personnel already adhere to this procedure, this should be outlined in the sampling plan. The Sampling and Analysis Plan should also include decision criteria to be

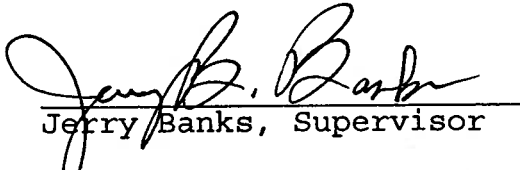
used to replace or repair sampling equipment and/or monitoring wells.

2. The teflon coated wire which is connected to the bailers appeared worn with the wire exposed. These cords may need to be replace to keep from losing the bailer in the well.
3. Monitoring well CMW-19 should be checked to ensure that the interior casing was not damaged by whatever caused the rotation of the well.
4. The eroded area in the southern portion of the closed impoundment should be repaired.

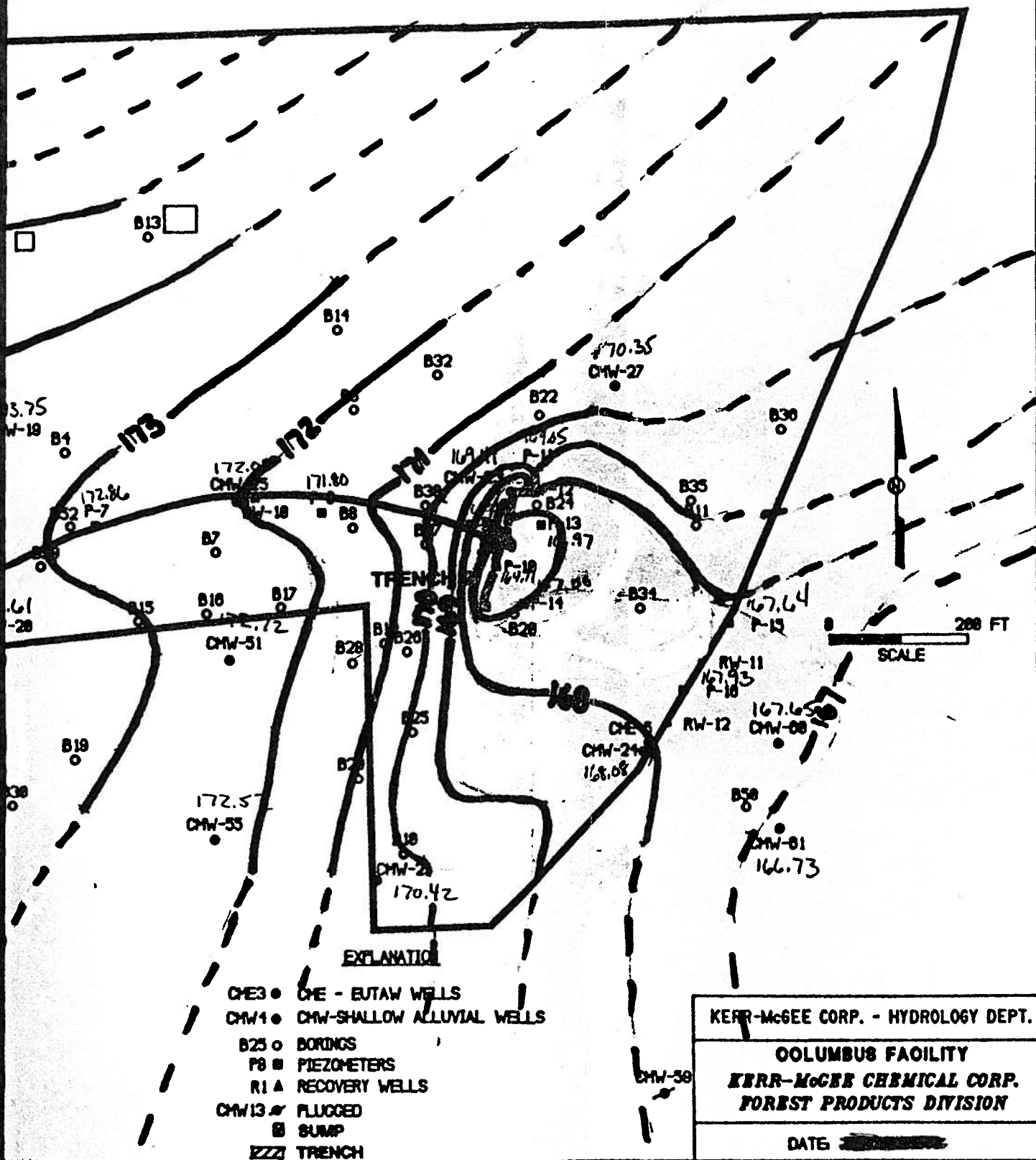
11. Signed


Bruce Ferguson, Inspector

5/30/93
Date


Jerry Banks, Supervisor

6/1/93
Date



1 WITH ALL WELL AND SOIL BORING LOCATIONS

9

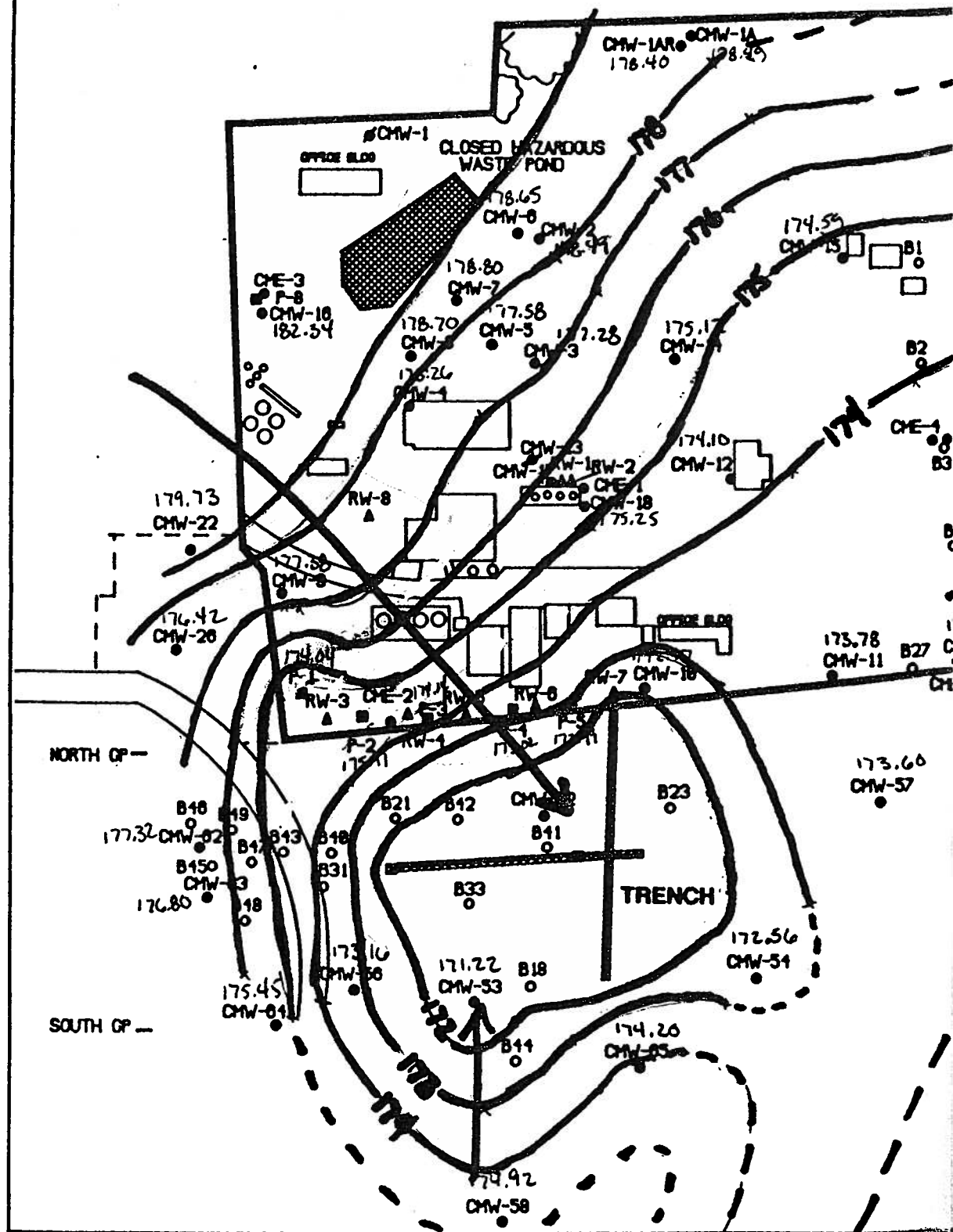


FIGURE 1: COLUMBUS, MISSISSIPPI



KERR-McGEE CHEMICAL CORPORATION

KERR-MCGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

TREATED STORAGE YARD INCIDENT DRIPPAGE INSPECTION REPORT

[illegible]

NOTE - COMPLETE DAILY WHILE PLANT IS IN OPERATION.
COMPLETE EVERY 72 HRS WHEN PLANT IS NOT IN OPERATION.
NOTIFY PLANT MANAGER WHEN DRIPPAGE EXCEEDS 1 POUND.



FIGURE 3-3

DRIP PAD/BLACK TIE STORAGE YARD INSPECTION REPORT
KERR-McGEE CORPORATION, FOREST PRODUCTS DIVISION
40 CFR, SUBPART W
WEEK OF _____

INSPECTION ITEMS PERFORMED	Good	Attention Required (Describe)	MAINTENANCE PERFORMED AND DATE
*DRIP PAD CONDITION			
Sloped for free draining	_____		
Curbs	_____		
Sealant Condition	_____		
Crack free/Gap free	_____		
Corrosion free	_____		
Dates cleaned:	_____	_____	_____
Cleaning procedure (code):	_____	_____	_____
Trackage minimized	_____		
*COLLECTION SYSTEM			
Front door pit	_____		
Sump pump	_____		
Prevent run-on	_____		
Prevent run-off	_____		
Overflow protection	_____		
Storage tank capacity:	_____		
Dates cleaned	_____	_____	_____
Cleaning procedure	_____	_____	_____
*BLACK TIE STORAGE YARD			
Appearance	_____		
Debris free	_____		
De Minimis drippage	_____		

* Drip Pad and Collection System must be inspected every 7 days or after a ≥ 2 inch rain in a 24 hour period.
 Black Tie Storage Yard must be inspected monthly.

** All F034 waste must be removed every 90 days.

CLEANING CODES:

P - Pressure Wash
 S - Steam
 M - Mechanical
 B - Broom
 E - Emulsifier

Signature: _____

Time: _____

Date: _____

FIGURE 3-4

DRIPPAGE CERTIFICATION REPORT
KERR-McGEE CHEMICAL CORPORATION, FOREST PRODUCTS DIVISION
40 CFR, Subpart W

[illegible]

APPENDIX B
Generic Operation and Maintenance
Inspection Form

Part One—Pre-Inspection Planning Guide

Part Two—Field Inspection Guide

Part Three—Compliance Decision Making

APPENDIX B
Part One

Pre-Inspection Planning Guide

PART ONE

The field inspector and the enforcement official will meet and complete four tasks. Those tasks are: 1) review enforcement and permitting actions taken to date at the facility, 2) review the owner/operator's sampling and analysis program, 3) review the owner/operator's O&M program, and 4) prepare site-specific inspection objectives.

1. Facility identification number MSD990866329
2. Name of facility contact John Getz
phone number (601) _____
3. Address of facility P.O. Box 906
Columbus, MS 39701

4. Does the facility have:

Interim Status? (go to 5a)

detection monitoring

assessment monitoring

corrective action (§3008(h))

Permit Status? (go to 5b)

detection monitoring

compliance monitoring

corrective action

5a. Past actions taken at facility (interim status)

Type

Date(s)

Operation and Maintenance Inspection _____

Comprehensive (Ground-Water) _____

Monitoring Evaluation _____

Case Development Inspection _____

RCRA Facility Assessment _____

Compliance Evaluation Inspection _____

Ground-Water Task Force Investigation _____

Complete the following questions in regard to the actions listed on the previous page:

- **Do you have a copy of completed inspection reports or site studies? Yes ____ No ____**
- **For each, summarize deficiencies identified in the owner/operator's sampling program and/or the owner/operator's operation and maintenance program.**

Go to 6a.

5b. Actions taken at the facility (permit status)

<u>Type</u>	<u>Date</u>
• Permit Issuance	_____
• Operation and Maintenance Inspection	_____
• Comprehensive (Ground-Water)	_____
• Monitoring Inspection	_____
• Case Development Inspection	_____
• Compliance Evaluation Inspection	_____
• Other	_____

Complete the following in regard to the actions listed above:

- Do you have a copy of the permit and copies of inspection reports completed after permit issuance? Yes ☒ No ☐
- Summarize deficiencies identified after permit issuance regarding the owner/operator's operation and maintenance program.

Go to 6b

6a. Identify enforcement actions issued to the facility in regard to interim status violations.

<u>Action</u>	<u>Date(s)</u>
• §3008(a) complaint/order	_____
• §3013 complaint/order	_____
• §3008(h) complaint/order	_____
• §7003 complaint/order	_____
• Referral for litigation	_____
• Other	_____

Complete the following regarding the actions listed above:

- For each, identify if the enforcement action is focused on the owner operator's sampling and analysis program and/or the owner/operator's operation and maintenance program. Summarize relevant requirements imposed on the owner/operator.

Go to 7

6b. Identify enforcement actions issued to the facility after the permit issuance date.

<u>Action</u>	<u>Date(s)</u>
• §3008(a) complaint/order	_____
• §3013 complaint/order	_____
• §3008(h) complaint/order	_____
• §7003 complaint/order	_____
• Referral for litigation	_____
• Other	_____

Complete the following regarding the actions listed above:

- For each, identify if the enforcement action focused on the owner/operator's sampling and analysis program and/or the owner/operator's operation and maintenance program. Summarize relevant requirements imposed on the owner/operator.

Go to 7

7. Review and summarize the owner/operator's sampling and analysis plan. (Note: Revise or add to the table if permit conditions dictate a different requirement the owner/operator must follow.) Does the Sampling and Analysis Plan:	Y/N
Include provisions for the measurement of static water elevations in each well prior to each sampling event?	Y
Specify the device to be used for measuring water level elevations?	Y
Specify the procedure for measuring water levels?	Y
Provide for the measurement of depth to standing water and depth to the bottom of the well to 0.01 feet?	Y
Explain whether dedicated or non-dedicated sampling equipment is used and the type of sampling equipment?	N
Describe procedures for evacuating wells?	
Provide for the use of sampling devices constructed of inert materials such as fluorocarbon resin or stainless steel?	Y
Provide for dedicated sampling devices for each well or alternately provide for decontamination of sampling devices and the collection of blanks between wells?	Dedicated
Provide for the collection and containerization of samples in the order of volatilization potential?	N
Identify the preservation methods and sample containers the owner/operator will use?	Y
Describe procedures for transferring samples to off-site laboratories?	
Describe a chain-of-custody program which includes the use of sample labels, sample seals, field logbooks, chain-of-custody records, sample analysis request sheets, and laboratory logbooks?	
Include provisions for collection of field, trip, and equipment blanks?	
Include an inventory of sampling equipment and sampling devices used as part of the monitoring program?	
Include detailed operating, calibration, and maintenance procedures for each sampling device?	

(Continued)

(Continued from previous page)	Y/N
Include maintenance schedules for sampling equipment? (Refer to Appendix D for discussion of maintenance techniques for gas bladder pumps.)	
Include decision criteria to be used to replace or repair sampling equipment and/or monitoring wells?	
*Describe in detail sample handling procedures in place at the owner/operator's laboratory (refer to RCRA Laboratory Audit Inspection Guide for more detail)?	
*Describe in detail the procedures that will be used to perform analyses in the owner/operator's laboratory. (refer to RCRA Laboratory Audit Inspection Guide for more detail)?	
*Describe in detail quality assurance/quality control procedures in place? (refer to RCRA Laboratory Audit Inspection Guide for more detail.)	

***NOTE:** *The RCRA Laboratory Audit Inspection Guide (RCRA Ground-Water Monitoring Systems)* describes the information the owner/operator should include in the Sampling and Analysis Plan regarding the owner/operator's laboratory program. The inspector may want to supplement the checklist in this manual with the checklist in the *RCRA Laboratory Audit Inspection Guide* while planning an operation and maintenance inspection.

Go to 8

COMMENTS ON SAMPLING AND ANALYSIS PLAN

8. Complete the following table. Use a separate entry for each well and piezometer in the monitoring system:

Identification Number	Type of Well Sampling Equipment (pump or bailer)	Depth to Water Last Inspection (if available)	Depth to Bottom Last Inspection (if available)	Notes/Comments
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				

After working through Part One, the enforcement official and the field inspector should know:

- the number and location of monitoring wells and piezometers at the facility;
- the procedures and techniques the owner/operator uses to collect ground-water samples;
- the details of the owner/operator's operation and maintenance program in-place at the facility; and
- the existence and nature of any permitting or enforcement action which may affect the field inspection.

The inspector will need the following equipment to conduct the field inspection:

- facility map with locations of wells and piezometers
- bound field notebook
- camera
- weighted tape measure or electronic water level indicator (made of inert material),
- deionized water, hexane (or laboratory strength cleaner), and sterile, disposable paper towels or gauze for decontamination of tape measure or probe
- surveyor's chain

(Note: additional equipment will be needed if the inspector wishes to obtain a split sample from the owner/operator.)

APPENDIX B

Part Two

Field Inspection Guide

PART TWO

The field inspector will complete four tasks during the field inspection. They are:

1) review the operating record to identify evidence of deficiencies in the owner/operator's sampling and/or operation and maintenance programs; 2) visually inspect each well and piezometer for evidence of damage or deterioration; 3) obtain measurements from the operations record of depths of water levels and well depths for each well and piezometer; and 4) visually observe the owner/operator's field crew as they collect ground-water samples.

Name of inspector(s) DEWE FERGUSON

Date(s) of inspection 5/5/93

1. Review the operating record of the facility. Does the operating record:	Y/N
Include annual reports of ground-water monitoring results including ground-water level data from each well and piezometer in the monitoring system?	Y
Include an inventory of all sampling devices and purging equipment in use at the facility and information on model number, serial number and manufacturers name?	Y <i>DeW</i>
Include detailed operating, calibration and maintenance procedures for each sampling device?	SAP
Describe decision criteria to be used to replace or repair sampling equipment and/or monitoring wells?	SAP <i>IN</i>
Include schedules for performing operation and maintenance activities related to the ground-water monitoring system?	SAP
Include records for ground-water monitoring which provide information on 1) the date, exact place and time of sampling or measurements; 2) the individual(s) who performed the sampling or measurements; 3) the date(s) analyses were performed; 4) the analytical techniques or methods used; and 5) the results of such analyses?	Y
Include records of all monitoring information including all calibration and maintenance records?	Y
Include records of monitoring information including determination of ground-water surface elevations?	Y
Include a determination of ground-water flow rate and direction(s) in the uppermost aquifer on an annual basis (e.g., prepare a potentiometric map annually using data collected during the year)?	Y
Provide for more frequent and intensive inspection of wells constructed of non-inert casing such as PVC? (Refer to Appendix A for permit example.)	NO

COMMENTS ON OPERATING RECORD

**QUARTERLY GROUNDWATER ELEVATION DATA
KERR-McGEE CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION
COLUMBUS, MISSISSIPPI**

Data recorded on

5/4/93

Well depth is checked
once a year and
was not scheduled
for this sampling event.

Page 1 of 3

WELL #	TOC ELEV.	STICK UP	DEPTH TO WATER	WATER ELEVATION (FEET)	WELL DEPTH (FEET)	SINKER THICKNESS (FEET)	FLOATERS (FEET)
CMW-1	192.92	4.95	<i>Deleted</i>				
CMW-1A	183.29	2.52	4.80	178.49			
CMW-1AR	184.59 183.61	3.05	5.69	178.40			
CMW-2	180.68	3.22	2.19	178.49			
CMW-3	181.82	3.76	4.54	177.28			
CMW-4	182.08	3.63	3.82	178.26			
CMW-5	180.75	2.02	3.17	177.58			
CMW-6	181.06	3.29	2.41	178.65			
CMW-7	181.27	3.40	2.47	178.80			
CMW-8	181.64	3.39	2.94	178.70			
CMW-9	182.92	3.58	5.54	177.38		0.32	—
CMW-10	181.44	3.07	8.87	172.47		TRACE	
CMW-11	179.10	-0.07	5.32	173.78			
CMW-12	182.02	1.63	7.92	174.10		1.94	
CMW-14	180.74	3.69	5.62	175.12			
CMW-15	182.60	3.21	8.01	174.59			
CMW-16	187.59	3.29	5.25	182.34			

**QUARTERLY GROUNDWATER ELEVATION DATA
KERR-McGEE CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION
COLUMBUS, MISSISSIPPI**

Data recorded on *5/4/93*

Page 2 of 3

WELL #	TOC ELEVATION	STICK UP	DEPTH TO WATER	WATER ELEVATION (FEET)	WELL DEPTH (FEET)	SINKER THICKNESS (FEET)	FLOATERS (FEET)
CMW-17	182.87	1.90	<i>7.51</i>	<i>175.36</i>		<i>4.91</i>	
CMW-18	183.72	2.81	<i>8.47</i>	<i>175.25</i>		<i>1.23</i>	
CMW-19	184.07	3.20	<i>10.32</i>	<i>173.75</i>			
CMW-20	182.86	3.20	<i>9.25</i>	<i>173.61</i>			
CMW-21	181.10	3.38	<i>10.72</i>	<i>170.42</i>			
CMW-22	185.98	3.40	<i>6.25</i>	<i>179.73</i>			
CMW-23	175.64	-0.19	<i>7.23</i>	<i>169.41</i>			
CMW-24	173.35	-0.28	<i>5.27</i>	<i>168.08</i>			
CMW-25	180.30	-0.43	<i>8.22</i>	<i>172.08</i>		<i>4.84</i>	
CMW-26	181.29	-0.35	<i>4.87</i>	<i>176.42</i>			
CMW-27	176.07	-0.74	<i>5.72</i>	<i>170.35</i>			
CMW-51	181.14	-0.32	<i>8.42</i>	<i>172.72</i>			
CMW-53	175.84	-0.20	<i>4.62</i>	<i>171.22</i>			
CMW-54	176.26	-0.30	<i>3.70</i>	<i>172.56</i>			
CMW-55	178.97	-0.22	<i>6.45</i>	<i>172.52</i>			
CMW-56	176.26	-0.39	<i>3.10</i>	<i>173.16</i>			
CMW-57	180.31	-0.41	<i>6.71</i>	<i>173.60</i>			
CMW-58	175.79	-0.33	<i>0.87</i>	<i>174.92</i>			
CMW-60	175.75	2.36	<i>8.10</i>	<i>167.65</i>			
CMW-61	175.92	2.32	<i>9.19</i>	<i>166.73</i>			
CMW-62	178.14	-0.25	<i>.87</i>	<i>177.32</i>			
CMW-63	177.84	-0.65	<i>1.04</i>	<i>176.80</i>			
CMW-64	178.56	-0.23	<i>3.11</i>	<i>175.45</i>			
CMW-65	178.10	-0.26	<i>3.90</i>	<i>174.20</i>			

CMW52-

9.63

**QUARTERLY GROUNDWATER ELEVATION DATA
KERR-McGEE CHEMICAL CORPORATION
FOREST PRODUCTS DIVISION
COLUMBUS, MISSISSIPPI**

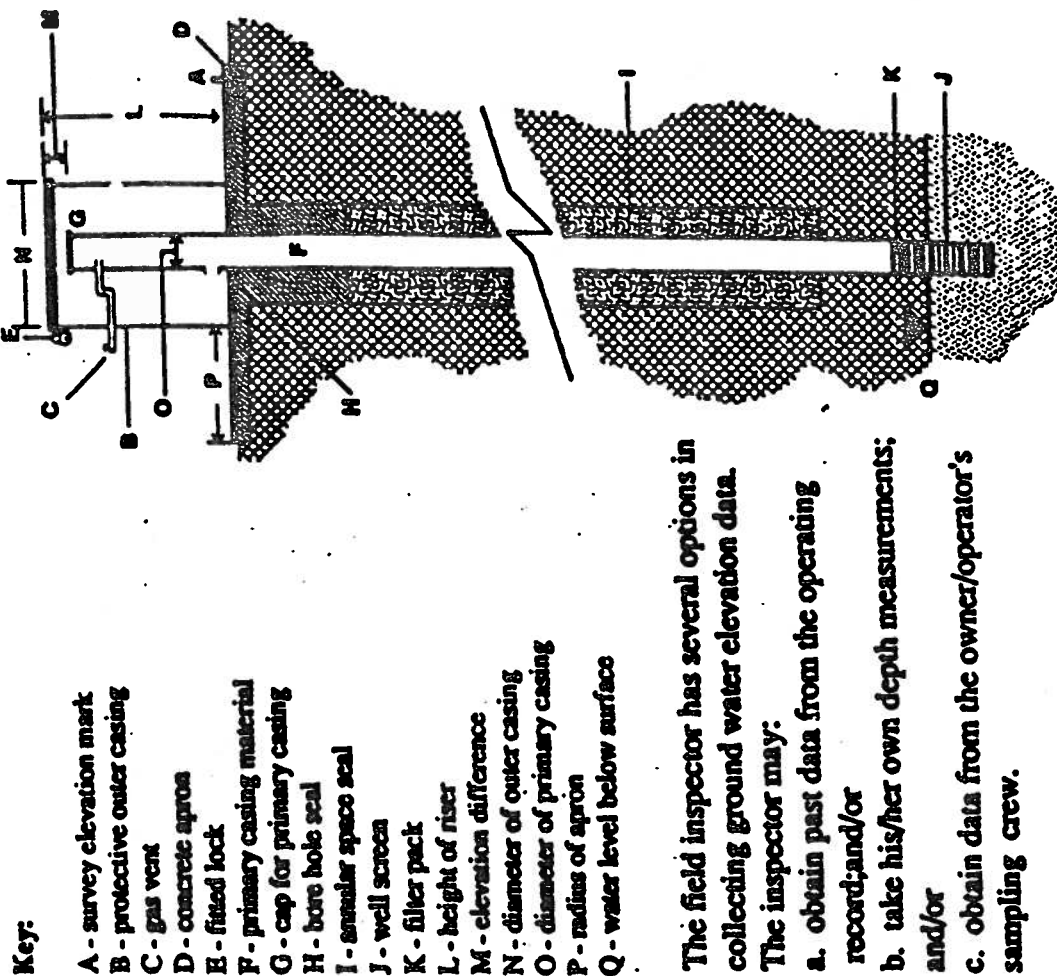
Data recorded on *5/4/93*

Page 3 of 3

WELL #	TOC ELEV.	STICK UP	DEPTH TO WATER	WATER ELEVATION (FEET)	WELL DEPTH (FEET)	SINKER THICKNESS (FEET)	FLOATERS (FEET)
CME1	183.16	2.58	<i>7.93</i>	<i>175.23</i>			
CME2	181.13	2.61	<i>6.68</i>	<i>178.52</i>			
CME3	186.72	4.78	<i>5.68</i>	<i>181.04</i>			
CME4	183.01	2.41	<i>11.19</i>	<i>171.82</i>			
CME5	173.40	-0.08	<i>9.31</i>	<i>164.09</i>			
CME6	179.49	-0.12	<i>15.42</i>	<i>164.07</i>			
RW1	183.06	2.95	<i>7.70</i>	<i>175.36</i>		<i>3.74</i>	
RW2	182.67	3.00	<i>Pump in Well</i>				
P1	179.48	-0.14	<i>5.44</i>	<i>174.04</i>		<i>Trace</i>	
P2	178.91	-0.10	<i>3.44</i>	<i>175.47</i>		<i>0.00</i>	
P3	178.13	-0.14	<i>3.99</i>	<i>174.14</i>		<i>0.60</i>	
P4	177.24	-0.36	<i>4.22</i>	<i>173.02</i>		<i>Trace</i>	
P5	177.55	-0.19	<i>4.56</i>	<i>172.99</i>			
P6	179.44	-0.12	<i>7.64</i>	<i>171.80</i>			
P7	181.11	0.01	<i>8.25</i>	<i>172.86</i>		<i>4.25</i>	
P8	183.71	0.23	<i>2.64</i>	<i>181.07</i>			
P9	175.68	-0.26	<i>9.47</i>	<i>166.21</i>			
P10	175.63	-0.24	<i>11.52</i>	<i>164.11</i>			
P11	175.84	-0.02	<i>7.79</i>	<i>169.05</i>			
P12	175.19	-0.30	<i>7.18</i>	<i>168.01</i>			
P13	173.97	-0.21	<i>7.00</i>	<i>166.97</i>		<i>3.53</i>	
P14	175.00	-0.33	<i>8.00</i>	<i>167.00</i>			
P15	172.43	-0.24	<i>4.79</i>	<i>167.64</i>			
P16	173.03	-0.30	<i>5.10</i>	<i>167.93</i>			

3. Obtain data on depth to standing water and depth to the bottom of each monitoring well and piezometer in the owner/operator's monitoring system. Record depth measurements to the nearest 0.01 feet. Record the measurements

Date	Well/ Piezometer I.D. No.	Depth to Water (0.01')	Depth of Well/ Piezometer (0.01')



1. The field inspector has several options in collecting ground water elevation data. The inspector may:
 - a. obtain past data from the operating record; and/or
 - b. take his/her own depth measurements; and/or
 - c. obtain data from the owner/operator's sampling crew.

4. Observe the owner/operator's staff as they collect ground-water samples at several wells. Complete the following table for each well (Note: revise or add to the table if permit conditions dictate a different requirement the owner/operator must follow):

Position/Title	Name	Sampling Experience (years and type)

Well Identification Number _____	Y/N	Photograph Taken Y/N
Did the sampling crew measure static water levels in the well and well depths prior to the sampling event?	Y	N
Did the sampling crew use a steel tape or electronic device to take depth measurements?	Y	N
Did the sampling crew record depths to ± 0.01 feet?	Y	N
Did the sampling crew follow these procedures: 1. remove locking and protective cap; 2. sample the air in the well head for organic vapors; 3. determine the static water level; and 4. lower an interface probe into the well to detect immiscible layers.	not observed	N
If immiscible samples were collected, were they collected prior to well purging?	N/A	N
Did the sampling crew evacuate low yielding wells to dryness prior to sampling?	N/A	N
Did sampling crew evacuate high yielding wells so that at least three casing volumes were removed?	Y	N
Did the sampling crew collect the purge water for storage and analysis or for shipment off-site to a RCRA treatment facility?	treatment facility's wastewater treatment system	N
Were sampling devices constructed of fluorocarbon resins or stainless steel?	Y	N

(Continued)

Well Identification Number _____	Y/N	Photograph Taken Y/N
If the sampling crew used dedicated samplers, did they disassemble and thoroughly clean the devices between samples? <i>dedicated samplers stored in casing</i>		N
If samples are collected for organic analyses, did the cleaning procedure include the following steps: 1. non phosphate detergent wash 2. tap water rinse 3. distilled/deionized water rinse 4. acetone rinse 5. pesticide-grade hexane rinse?	N/A	N
If samples are collected for inorganic analyses, does the cleaning procedure include the following steps: 1. dilute acid rinse (HNO ₃ or HCL) 2. distilled/de-ionized water rinse?	N/A	N
Did the sampling crew take trip blanks, field blanks and equipment blanks?	?	N
If the sampling crew used bailers, were they bottom valve bailers?	Y	N
If the sampling crew used bailers, was "teflon" coated wire, single strand stainless steel wire or monofilament used to raise and lower the bailer? <i>old worn & wire exposed</i>		N
If the sampling crew used bailers, did they lower the bailer slowly to the well?		N
If the sampling crew used bailers, were the bailer contents transferred to the sample container to minimize agitation and aeration?	Y	N
Did the sampling crew take care to avoid placing clean sampling equipment, hoses, and lines on the ground or other contaminated surfaces prior to insertion in the well?	Y	N
If the sampling crew used dedicated bladder pumps: Was the compressed gas from an oilless compressor certified quality commercial compressed gas cylinder? If not, was a suitable oil removal purification system installed and maintained?	N/A	N
Was the bladder pump controller capable of throttling the bladder pump discharge flow to 100 ml/min or less for continuous periods of at least 20-30 seconds without restricting liquid discharge?	N/A	N

(Continued)

Well Identification Number _____	Y/N	Photograph Taken Y/N
Were samples taken from the bladder pump discharge tube, and not from any purge device discharge tube?	Y/A	N
Was the bladder pump discharge flow checked for the presence of gas bubbles before each sample collection, as a test for bladder integrity?	N/A	N
Was bladder pump flow performance monitored regularly for dropoff in flow rate and discharge volume per cycle?	N/A	N
Was the bladder pump incorporated in a combination sample-purge pump design which can expose the bladder pump interior and discharge tubing to the pump drive gas? If so, were operating procedures established and followed to prevent at all times the entry of drive gas into the sample flow or into the bladder pump interior?	N/A	N
Did the sampling crew collect and containerize samples in the order of the volatilization sensitivity of the parameters?	Y	N
Did the sampling crew measure the following parameters in the field: pH, temperature, specific conductance?	Y	N
Did the sampling crew sample background wells before sampling downgradient wells?		N
Did the sampling crew use fluorocarbon resin or polyethylene containers with polypropylene caps for samples requiring metals analysis?	N/A	N
Did the sampling crew use glass bottles with fluorocarbon resin-lined caps for samples requiring metals analysis?	N/A	N
If metals were the analytes of concern, did the sampling crew use containers cleaned with nonphosphate detergent and water, and rinsed with nitric acid, tap water, hydrochloric acid, tap water and finally Type II water?	N/A	N
If organics were the analytes of concern, did the sampling crew use containers cleaned with nonphosphate detergent, rinsed with tap water, distilled water, acetone, and finally pesticide quality hexane?	Y	N
Did the sampling crew filter samples requiring analysis for organics?	N	N

COMMENTS ON SAMPLING PROGRAM

Part 1

General Site Information

Facility Name: KERR-McGEE
Address: P.O. Box 906
Columbus, MS 39701
I.D. Number: MSD99081616329
Contact: John Getz
Title: Plant Manager
Phone Number: _____

Type of Ownership:

____ Federal ____ State ____ County ____ Municipal ☒ Private

Facility Status:

____ Generator ____ Transporter ____ Treatment ____ Storage ☒ Disposal

Regulatory Status:

☒ Interim Status ☐ Part B Submitted
☒ Permitted ☐ Part B in Preparation

Principal Inspector Name: BRUCE FERGUSON Title: ENV. SCI. III
Organization: MS DED Phone Number: (601) 961-5141

Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Representing</u>
<u>BRUCE FERGUSON</u>	<u>ENV. SCI. III</u>	<u>MS DED</u>
<u>TOMMY HELMS</u>	<u>ASST PLANT MGR</u>	<u>KMCC</u>
<u>BO KLUTCH</u>	<u>HYDRO FIELD ASSISTANT</u>	<u>KMCC</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Part ____

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? ☒ Yes ☐ No ☐ NA

a. If yes, EPA I.D. No. 99 0866329 ____
If no, explain. _____

2. Has facility received hazardous waste from a foreign source? ☐ Yes ☒ No ☐ NA

a. If yes, has it filed a notice with the Regional Administrator? ☐ Yes ☐ No ☐ NA

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ☒ Yes ☐ No ☐ NA

a. If yes, does it include: (264.13) (265.13)

1. Parameters for which each waste will be analyzed? ☒ Yes ☐ No ☐ NA

2. Test methods used to test for these parameters? ☒ Yes ☐ No ☐ NA

3. Sampling method used to obtain sample? ☒ Yes ☐ No ☐ NA

4. Frequency with which the initial analyses will be reviewed or repeated? ☒ Yes ☐ No ☐ NA

5. (For offsite facilities) waste analyses that generators have agreed to supply? ☐ Yes ☐ No ☒ NA

6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:

a. Procedures to be used to determine the identity of each movement of waste. ☐ Yes ☐ No ☒ NA

b. Sampling method to be used to obtain representative sample of the waste to be identified. ☐ Yes ☐ No ☒ NA

4. Does the facility provide adequate security through: (264.14) (265.14)

a. 24-hour surveillance system (e.g., television monitoring or guards)? ☒ Yes ☐ No ☐ NA

OR

- b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)? ☒ Yes ☐ No ☐ NA

Describe fence

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? ☒ Yes ☐ No ☐ NA

Describe _____

General Inspection Requirements (264.15) (265.15)

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

- | | |
|--|--|
| a. Monitoring equipment? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| b. Safety and emergency equipment? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| c. Security devices: | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| d. Operating and structural equipment? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| e. Types of problems of equipment: | |
| 1. Malfunction | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 2. Operator error | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 3. Discharges | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |

6. Does the owner/operator maintain an inspection log? ☐ Yes ☐ No ☐ NA

- a. If yes, does it include:

- | | |
|---|--|
| 1. Date and time of inspection? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 2. Name of inspector? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 3. Notation of observations? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 4. Date and nature of repairs or remedial action? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |
| 5. Identification of potential problems? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |

- b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) ☐ Yes ☐ No ☐ NA

- c. Are records kept a minimum of three years? ☐ Yes ☐ No ☐ NA

Personnel Training (264.16) (265.16)

7. Does the owner/operator maintain personnel training records at the facility? ☒ Yes ☐ No ☐ NA

Date of most recent training: March 1993

How long are they kept? INDEFINITELY

a. If yes, do they include:

1. Job title and written job description of each position? ☒ Yes ☐ No ☐ NA
2. Description of type and amount of training? ☒ Yes ☐ No ☐ NA
3. Records of training given to facility personnel? ☒ Yes ☐ No ☐ NA

Requirements for Ignitable, Reactive, or Incompatible Waste
(264.17) (265.17)

8. Does facility handle ignitable or reactive wastes? ☐ Yes ☒ No ☐ NA

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flames confined to specifically designated locations? ☐ Yes ☐ No ☒ NA

c. Are "No Smoking" signs posted in hazardous areas? ☐ Yes ☐ No ☒ NA

d. Are precautions documented (Part 264 only)? ☐ Yes ☐ No ☒ NA

9. Check containers

a. Are containers leaking or corroding? ☐ Yes ☐ No ☒ NA

b. Is there evidence of heat generation from incompatible wastes? ☐ Yes ☐ No ☒ NA

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31) ☐ Yes ☒ No ☐ NA

If yes, use narrative explanation sheet to explain.

2. Is the facility equipped with: (264.32) (265.32)

a. Internal communication or alarm system? ☒ Yes ☐ No ☐ NA

1. Is it easily accessible in case of emergency? ☒ Yes ☐ No ☐ NA

b. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No ☐ NA

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? ☒ Yes ☐ No ☐ NA

d. Water of adequate volume of hoses, sprinklers, or water spray system? ☒ Yes ☐ No ☐ NA

1. Describe source of water CITY WATER

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35) (265.35) ☒ Yes ☐ No ☐ NA

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (264.37) (265.37) ☒ Yes ☐ No ☐ NA

5. In the case that more than one police or fire department might respond, is there a designated primary authority? ☐ Yes ☐ No ☒ NA (264.37) (265.37)

a. If yes, name primary authority _____

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? (264.37) (265.37) ☒ Yes ☐ No ☐ NA

a. Are they really available to all personnel? ☒ Yes ☐ No ☐ NA

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (264.37) (265.37) ☒ Yes ☐ No ☐ NA

8. If State or local authorities declined to enter into agreements, is this entered in the operating record? (264.37) (265.37) ☐ Yes ☐ No ☒ NA

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? (264.53) (265.53) ☒ Yes ☐ No ☐ NA
- a. If yes, is it a revised SPCC Plan? ☐ Yes ☐ No ☐ NA
- b. Does contingency plan include: (264.52) (265.52)
1. Arrangements with local emergency response organizations? ☒ Yes ☐ No ☐ NA
2. Emergency coordinator's names, phone numbers and addresses? ☒ Yes ☐ No ☐ NA
3. List of all emergency equipment at facility and descriptions of equipment? ☒ Yes ☐ No ☐ NA
4. Evacuation plan for facility personnel? ☒ Yes ☐ No ☐ NA
2. Is there an emergency coordinator on site or on call at all times? (264.55) (265.55) ☒ Yes ☐ No ☐ NA

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, does the owner/operator retain copies of all manifests? ☐ Yes ☐ No ☒ NA
1. Are the manifests signed and dated and returned to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, is it accompanied by a shipping paper? ☐ Yes ☐ No ☒ NA
1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72) ☐ Yes ☒ No ☐ NA
- a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? ☐ Yes ☐ No ☒ NA
1. If no, has Regional Administrator been notified? ☐ Yes ☐ No ☒ NA

4. Does the owner/operator keep a written operating record at the facility? (264.73) (265.73)

☒ Yes ☐ No ☐ NA

a. If yes, does it include:

1. Description and quantity of each hazardous waste received?
2. Methods and dates of treatment, storage, and disposal?
3. Location and quantity of each hazardous waste at each location?
4. Cross-references to manifests/shipping papers?
5. Records and results of waste analyses?
6. Report of incidents involving implementation of the contingency plan?
7. Records and results of required inspections?
8. Monitoring, testing, and analytical data, for groundwater required by Subpart F?
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)?
10. Notices of generators as specified in Section 264.12(b) (Part 264)?

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

☐ Yes ☐ No ☒ NA

b. Does facility have copy of permit on site?

☒ Yes ☐ No ☐ NA

5. Does the facility submit a biennial report by March 1 every even-numbered year? (264.75) (265.75)

☒ Yes ☐ No ☐ NA

a. If yes, do reports contain the following information:

1. EPA I.D. number?
2. Date and year covered by report?
3. Description/quantity of hazardous waste?
4. Treatment, storage, and disposal methods?
5. Monitoring data under Section 265.94(a)(2) and (b)(2) (Part 265)?
6. Most recent closure and post-closure cost estimates?
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?
8. Certification signed by owner/operator?

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

☒ Yes ☐ No ☐ NA

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (264.76) (265.76)

☐ Yes ☒ No ☐ NA

a. If yes, has he submitted an unmanifested waste report to the Executive Director?

☐ Yes ☐ No ☒ NA

7. Does the facility submit to the Executive Director reports on releases, fires, and explosions; contamination and monitoring data; and facility closure?

☒ Yes ☐ No ☐ NA

Part ____

LAND DISPOSAL RESTRICTIONS CHECKLIST

Section A - General

1. Are hazardous wastes land-disposed on site? ☐ Yes ☒ No ☐ NA
 - a. If yes, are one or more of the following circumstances true:
 1. Granted extension from effective date pursuant to Section 268.5? ☐ Yes ☐ No ☒ NA
 2. Granted exemption from a prohibition pursuant to a petition under Section 268.6? ☐ Yes ☐ No ☒ NA
 3. Disposing of soil or debris resulting from a CERCLA response action or a RCRA corrective action, which will not be prohibited until November 8, 1988? ☐ Yes ☐ No ☒ NA
 4. Facility is a small quantity generator of less than 100 kg of hazardous waste per month? ☐ Yes ☐ No ☒ NA
 5. Wastes not yet prohibited by Part 268? ☐ Yes ☐ No ☒ NA
2. Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal? ☐ Yes ☒ No ☐ NA
3. Are there active surface impoundments used for treatment of hazardous wastes? ☐ Yes ☐ No ☒ NA
 - a. If yes, does the unit's design and operation meet the requirements set forth in Section 268.4? ☐ Yes ☐ No ☒ NA
4. Has the facility sought exemption from any prohibition under Subpart C of Section 268 for the disposal of a restricted hazardous waste? ☐ Yes ☒ No ☐ NA
 - a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis, comprehensive environmental characterization of unit site, QA/QC plan, sampling, testing, modeling)? ☐ Yes ☐ No ☒ NA
5. Has the facility determined whether it generates a restricted waste through waste analysis? (268.7) ☒ Yes ☐ No ☐ NA
 - a. If yes, is the facility, in fact, handling a restricted waste(s)? ☐ Yes ☒ No ☐ NA
 - b. If yes, does the restricted waste required treatment? ☐ Yes ☒ No ☐ NA

- c. If yes, has the generator notified the treatment facility in writing, and does the notification include all required components (EPA hazardous waste number, corresponding treatment standard, manifest number of shipment)? ☐ Yes ☐ No ☒ NA
6. Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? (268.10) ☐ Yes ☒ No ☐ NA
- a. If yes, do any of the following conditions apply:
1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? ☐ Yes ☐ No ☒ NA
 2. The solvent waste is generated from a CERCLA response corrective action? ☐ Yes ☐ No ☒ NA
 3. The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. ☐ Yes ☐ No ☒ NA
- b. If no, have any of these restricted wastes began land-disposed (except in an injection well) since November 8, 1986? ☐ Yes ☒ No ☐ NA
7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? ☐ Yes ☒ No ☐ NA
- a. If yes, do any of the following conditions apply:
1. Wastes are treated to meet standards of Subpart D of Section 268? ☐ Yes ☐ No ☒ NA
 2. Wastes are disposed of at a facility that has been granted a petition? ☐ Yes ☐ No ☒ NA
 3. An extension has been granted? ☐ Yes ☐ No ☒ NA
- b. If no, were these restricted wastes land disposed after November 8, 1988? ☐ Yes ☐ No ☒ NA
8. Are restricted wastes being treated? ☐ Yes ☒ No ☐ NA
- a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels? ☐ Yes ☐ No ☒ NA

Section B - Generator Compliance

1. Waste Identification

a. Does the generator handle the following wastes:

1. Solvent wastes

- (i) F001, F002, F004, or F005
(ii) F003

___ Yes ☒ No ___ NA
___ Yes ☒ No ___ NA

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

___ Yes ___ No ☒ NA

Note: Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially misclassified F-solvents, Appendix A-2 presents a list of corresponding F and U wastes.

2. Dioxin wates (F020-F023, F026-F028)
3. Potential California List Wastes
(see Appendix C)

___ Yes ☒ No ___ NA
___ Yes ☒ No ___ NA

- (i) D002
(ii) D004-D011
(iii) Any other waste characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides?
(iv) Any F, K, P, or U wastes subject to "soft hammer" requirements that may qualify as California wastes due to HOCs, metals, or cyanide content?
(See Appendix F)

___ Yes ☒ No ___ NA
___ Yes ☒ No ___ NA
___ Yes ☒ No ___ NA

4. First Third Wastes (See MHWMR 268.10)

___ Yes ☒ No ___ NA
___ Yes ☒ No ___ NA

5. Second Third Wastes (See MHWMR 268.11)

___ Yes ☒ No ___ NA

6. (Reserved)

- (i) Are any of the above "soft hammer" wastes? (See Appendices D & E)

___ Yes ☒ No ___ NA

2. BDAT Treatability Group - Treatment Standards Identification

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

___ Yes ☒ No ___ NA

Part _____

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No.? (262.12)

☒ Yes ___ No ___ NA

a. If yes, EPA I.D. No. 990866329

Section B - Manifest

1. Does generator ship waste offsite? (262.20)

☒ Yes ___ No ___ NA

a. If no, do not fill out Sections B and D.

b. If yes, identify primary offsite facility(s).

Chem Waste Mgmt

2. Does generator use manifest? (262.20)

☒ Yes ___ No ___ NA

a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)?

___ Yes ___ No ☒ NA

1. If yes, does generator indicate this when sending waste to a TSD facility?

___ Yes ___ No ☒ NA

b. If yes, does manifest include the following information?

☒ Yes ___ No ___ NA

1. Manifest document No.

☒ Yes ___ No ___ NA

2. Generator's name, mailing address, telephone number

☒ Yes ___ No ___ NA

3. Generator EPA I.D. No.

☒ Yes ___ No ___ NA

4. Transporter Name(s) and EPA I.D. No.(s)

☒ Yes ___ No ___ NA

5. a. Facility name, address, and EPA I.D. No.

☒ Yes ___ No ___ NA

b. Alternate facility name, address, and EPA I.D. No.

☒ Yes ___ No ___ NA

c. Instructions to return to generator if undeliverable

☒ Yes ___ No ___ NA

6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number)

☒ Yes ___ No ___ NA

7. Emergency information (optional) (special handling instructions, telephone No.)

☒ Yes ___ No ___ NA

8. Is the following certification on each manifest form?

☒ Yes ___ No ___ NA

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? ☒ Yes ☐ No ☐ NA

If yes, complete a through e.

- a. 1. Did generator sign and date all manifests? ☒ Yes ☐ No ☐ NA
2. Who signed for generator? ☒ Yes ☐ No ☐ NA

Name Tony Williams Title Asst Mgr

- b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ☒ Yes ☐ No ☐ NA
2. Who signed and dated for transporter? ☒ Yes ☐ No ☐ NA

Name Varney Title _____

- c. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ☐ No ☐ NA
d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ☐ No ☐ NA
e. Does generator retain copies for 3 years? ☒ Yes ☐ No ☐ NA

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? (261.30) ☒ Yes ☐ No ☐ NA

a. If yes, list waste and quantities (include EPA Hazardous Waste No.) F034

2. Does generator solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20) ☐ Yes ☒ No ☐ NA

a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) _____

- b. Does generator determine characteristics by testing or by applying knowledge of processes? _____

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☐ Yes ☐ No ☒ NA

a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators?

☒ Yes ___ No ___ NA

a. If yes, did generator test all wastes to determine nonhazardous characteristics?

☒ Yes ___ No ___ NA

1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30)

☒ Yes ___ No ___ NA

2. a. Are containers to be shipped leaking or corroding?

___ Yes ___ No ☒ NA

b. Use sheet to describe containers and condition.

c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31)

___ Yes ___ No ☒ NA

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172?

☒ Yes ___ No ___ NA

4. Does generator mark each package in accordance with 49 CFR 172?

☒ Yes ___ No ___ NA

5. Is each container of 110 gallons or less marked with the following label? (262.32)

☒ Yes ___ No ___ NA

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

Manifest document No. _____

6. Does generator have placards to offer to transporters? (262.33)

☒ Yes ___ No ___ NA

7. Accumulation time: (262.34)

- a. Are containers used to temporarily store waste before transport? ☒ Yes ___ No ___ NA
1. If yes, is each container clearly dated:
Also, fill out rest of No. 7 (accum. time) ☒ Yes ___ No ___ NA
- b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ☒ Yes ___ No ___ NA
2. If yes, with what frequency? Weekly ☒ Yes ___ No ___ NA
- c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) ___ Yes ___ No ☒ NA

NOTE: If tanks are used, fill out checklist for tanks.

- d. Are the containers labeled and marked in accordance with Section D-3, D-4, and D-5 of this form? ☒ Yes ___ No ___ NA

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

- e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) ☒ Yes ___ No ___ NA

8. Describe storage area. Use photos and narrative explanation sheet.

Section E - Recordkeeping and Records (262.40)

1. Does generator keep the following reports for 3 years?

- a. Manifests and signed copies from ☒ Yes ___ No ___ NA
- b. Biennial Reports ☒ Yes ___ No ___ NA
- c. Exception reports ☒ Yes ___ No ___ NA
- d. Test results ☒ Yes ___ No ___ NA

2. Where are the records kept (at facility or elsewhere)?

Main Office

3. Who is in charge of keeping the records?

Name Tony Helms Title Asst Mgr

Appendix I - Satellite Accumulation Area

1. Source/Area: None

2. Type waste: _____

3. Condition of Containers: _____

a. Containers closed?

☐ Yes ☐ No ☐ NA

b. Containers properly labeled?

☐ Yes ☐ No ☐ NA

4. If > 55 gallons accumulated, has generator complied with 262.34(c)(2)?

☐ Yes ☐ No ☐ NA

Appendix II - Less-than-Ninety Day Storage

1. Source/Data: None

2. Type(s) of waste: _____

3. Condition of containers: _____

a. Containers closed?

☐ Yes ☐ No ☐ NA

b. Containers properly labelled?

☐ Yes ☐ No ☐ NA

c. Accumulation dates?

☐ Yes ☐ No ☐ NA

d. Area inspected?

☐ Yes ☐ No ☐ NA

Waste Information Worksheet
(To be filled out for each hazardous waste)

Waste Name: Incidental Drillage
Waste Code: F034

Process Generating Waste: drillage from yard
Spills from drillage in yard

How was determination made?

☒ Knowledge of Waste. Describe. _____
☐ Testing. Describe. _____

Waste Generation Rate (may be estimated) _____

Disposal Procedure: Chem waste

Site/Firm: _____

Is waste subject to requirements of MHWMR 268? Yes__ No__
Describe. _____

Is waste excluded under MHWMR 261.4? Yes__ No__
Describe. _____

- b. If yes, did the generator select the most stringent treatment standard for the constituent of concern [Section 268.41(b)]?

__Yes __No ☒ NA

c. F Solvents

Did the generator correctly determine the appropriate treatability group [Section 268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

__Yes __No ☒ NA

d. California Wastes

Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [Section 268.32(a)(3)]?

__Yes __No ☒ NA

e. First and Second Third Waste

1. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [Section 268.7(a)]?

__Yes __No ☒ NA

2. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

__Yes __No ☒ NA

3. Waste Analysis

- a. Did the generator determine whether the waste exceeds treatment standards based on Section 268.7(a):

1. Knowledge of wastes

__Yes __No ☒ NA

- (i) List wastes for which "applied knowledge" was used:

2. TCLP

☒ Yes ☐ No ☐ NA

- (i) List wastes for which "TCLP" was used:

Incidental druppage
Sediment in Product Tank

- (ii) MHWMR 268.41 lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP?

☐ Yes ☐ No ☒ NA

If yes, list: _____

3. Total waste analysis

☐ Yes ☐ No ☒ NA

4. If files were retained, describe content and basis of applied knowledge determination:

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

5. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [Section 264.13(a)(3)(i) or Section 265.13(a)(3)(i)]?

☐ Yes ☐ No ☒ NA

- b. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [Section 268.7(a)(1)]?

List those that exceeded standards: _____

List those that did not exceed standards: _____

- c. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [Section 268.3]

___ Yes ___ No ☒ NA

6. Has the generator conducted any testing of those hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes?

___ Yes ___ No ☒ NA

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?

___ Yes ___ No ☒ NA

4. Management

a. Onsite management

1. Were restricted wastes managed onsite?

___ Yes ☒ No ___ NA

2. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?

___ Yes ___ No ☒ NA

If yes, TSDf checklist must be completed.

b. Offsite Management

1. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number?	___ Yes ___ No <input checked="" type="checkbox"/> NA
(ii) Corresponding treatment standard?	___ Yes ___ No <input checked="" type="checkbox"/> NA
(iii) Manifest number?	___ Yes ___ No <input checked="" type="checkbox"/> NA
(iv) Waste analysis, if available?	___ Yes ___ No <input checked="" type="checkbox"/> NA

Identify offsite treatment facilities _____

2. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

(i) EPA hazardous waste I.D. number?	___ Yes ___ No <input checked="" type="checkbox"/> NA
(ii) Corresponding treatment standard?	___ Yes ___ No <input checked="" type="checkbox"/> NA

- (iii) Manifest number ☐ Yes ☐ No ☒ NA
(iv) Certification regarding waste and that it meets treatment standards? ☐ Yes ☐ No ☒ NA

Identify land disposal facilities receiving the BDAT certified wastes _____

3. If the generator's waste is subject to a Section 268.5 case by case exemption, a Section 268.6 "no migration" exemption, or a nationwide variance does the generator's records indicate that he or she submits with each waste shipment [Section 268.7(a)(3)]:

- (i) EPA Hazardous Waste Number? ☐ Yes ☐ No ☒ NA
(ii) Corresponding Treatment Standards? ☐ Yes ☐ No ☒ NA
(iii) All applicable prohibitions? ☐ Yes ☐ No ☒ NA
(iv) The manifest number? ☐ Yes ☐ No ☒ NA
(v) The date the wastes are subject to prohibitions? ☐ Yes ☐ No ☒ NA
(vi) Does generator keep records of all notifications/certifications send to offsite facilities? ☐ Yes ☐ No ☒ NA

List all prohibited wastes for which records are not provided per above [Section 268.7(a)(b)]:

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

4. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

- The EPA Hazardous Waste Number? ☐ Yes ☐ No ☒ NA
Applicable prohibitions? ☐ Yes ☐ No ☒ NA
The manifest number? ☐ Yes ☐ No ☒ NA
Waste analysis data, where available? ☐ Yes ☐ No ☒ NA

- (i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [Section 268.33(f)]? ☐ Yes ☐ No ☒ NA

If yes, list facility of destination and waste of concern [Section 268.8(a)(2)]

(ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [Section 268.7(a)(2)]? ☐ Yes ☐ No ☒ NA

(iii) Has the generator retained a copy of the demonstration on site [Section 268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No ☒ NA

(iv) Has the generator retained copies of all Section 268.8 certifications sent to the TSDF [Section 268.7(a)(6)] ☐ Yes ☐ No ☒ NA

(v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [Section 268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No ☒ NA

(vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [Section 268.8(b)(3)]? ☐ Yes ☐ No ☒ NA

5. Storage of Prohibited Waste

a. Were prohibited wastes stored for greater than 90 days? ☐ Yes ☐ No ☒ NA

If yes, was facility operating as a TSD under interim status or final permit [Section 262.34(b)]?

☐ Yes ☐ No ☒ NA

If yes, TSDF Checklist must be completed.

6. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ☐ Yes ☐ No ☒ NA

If yes, list type of treatment unit and processes

If yes, TSDF checklist must be completed.

Section C - Treatment, Storage & Disposal Requirements

1. General

- a. Does the facility conduct waste analysis (total and TCLP) on-site or through a commercial laboratory?

- b. Describe the frequency of sampling conducted by the facility.

2. Treatment Facilities

- a. Has the treatment facility revised its waste analysis plan [Section 268.7(b)] to meet the requirements of Section 264.13 or 265.13?

__Yes __No ☒ NA

- (i) Is the treatment facility conducting TCLP tests for wastes subject to treatment standards expressed as waste extracts per 268.7(b)(i)?

__Yes __No ☒ NA

- (ii) Is the treatment facility using the paint filter test for the California waste residues [Section 268.7(b)(ii)]?

__Yes __No ☒ NA

- (iii) Is the treatment facility testing the pH of California waste residues?

__Yes __No ☒ NA

- (iv) Is the treatment facility testing concentrations (not extracts) in the waste residues for prohibited wastes with established treatment standards expressed as waste concentrations? [Section 268.7(b)(3)]?

__Yes __No ☒ NA

- (v) Is the treatment facility testing extracts of the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [Section 268.7(b)(1)]?

__Yes __No ☒ NA

3. Land Disposal Facilities

- a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]? ☐ Yes ☒ No ☒ NA
- b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [Section 268.7(c)(2)]? ☐ Yes ☒ No ☒ NA
- c. Are they being tested in conformance with the frequency specified in the waste analysis plan [Section 268.7(c)(3)]? ☐ Yes ☒ No ☒ NA
- d. Are the appropriate tests (TCLP vs. total waste) being used [Section 268.7(c)(2)]? ☐ Yes ☒ No ☒ NA

4. Storage (Section 268.50)

- a. Are restricted wastes exceeding treatment standards stored (excepting wastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)? ☐ Yes ☒ No ☒ NA
- b. Are all containers clearly marked to identify content and date(s) entering storage [Section 268.50(a)(2)]? ☐ Yes ☒ No ☒ NA
- c. Do operating records track the location, quantity and dates that wastes exceeding treatment standards entered and were removed from storage [Section 264.73 or Section 265.73]? ☐ Yes ☒ No ☒ NA
- d. Do operating records agree with container labeling? [Section 268.50(a)(2) or Section 264.73 or Section 265.73] ☐ Yes ☒ No ☒ NA
- e. Is waste exceeding treatment standards stored for less than 1 year? ☐ Yes ☒ No ☒ NA
- If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? ☐ Yes ☒ No ☒ NA
- If yes, state how: _____
- f. Was/is waste exceeding treatment standards stored for more than one year? ☐ Yes ☒ No ☒ NA

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal:

5. Treatment in Surface Impoundments (Section 268.4)

- a. Are prohibited wastes placed in surface impoundments for treatment? ☐ Yes ☐ No ☒ NA
- b. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [Section 268.4(b) and Section 268.3]? ☐ Yes ☐ No ☒ NA
- c. Did the facility submit a certification of compliance with minimum technology and groundwater monitoring requirements, and the waste analysis plan to the Agency [Section 268.4(a)(4)]? ☐ Yes ☐ No ☒ NA
- d. Have the minimum technology requirements been met [Section 268.4(a)(4)]? ☐ Yes ☐ No ☒ NA
1. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [Section 268.4(a)(3)(iii)]? ☐ Yes ☐ No ☒ NA
- e. Have the Subpart F groundwater monitoring requirements been met [Section 268.4(a)(3)]? ☐ Yes ☐ No ☒ NA
- f. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [Section 268.4(a)(2)]? ☐ Yes ☐ No ☒ NA
- g. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels? ☐ Yes ☐ No ☒ NA
- h. Provide the frequency of analyses conducted on treatment residues: _____

Does the frequency meet the requirements of the waste analysis plan [Section 264.13 or Section 265.13]? ☐ Yes ☐ No ☒ NA

i. Does the operating record adequately document the results of waste analyses performed [Section 264.13 or Section 265.13]? ☐ Yes ☐ No ☒ NA

j. Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [Section 268.4(a)(2)(ii)]? ☐ Yes ☐ No ☒ NA

1. If answer to f is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) ☐ Yes ☐ No ☒ NA

k. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ☐ Yes ☐ No ☒ NA

l. When removed, were residues of restricted wastes managed subsequently in another surface impoundment? ☐ Yes ☐ No ☒ NA

1. Were these residues subject to a valid 268.8 certification? ☐ Yes ☐ No ☒ NA

m. When removed, were wastes treated prior to disposal? ☐ Yes ☐ No ☒ NA

1. If yes, are waste residues treated on or offsite? ☐ Yes ☐ No ☒ NA

2. Identify management method: _____

6. Other Treatment

a. Does the facility operate treatment units (regulated or exempt) (not including surface impoundments)? ☐ Yes ☐ No ☒ NA

b. Describe the treatment processes, including exempt processes: _____

c. Does the facility treat soft-hammered wastes? ☐ Yes ☐ No ☒ NA

1. If yes, is treatment occurring as described in the generator's certification/demonstration [Section 268.8(c)(1)]? ☐ Yes ☐ No ☒ NA
2. Did the treatment facility certify he treated the soft-hammered waste as per the generator's demonstration and maintain copies of all certifications [268.8(c)(1)]? ☐ Yes ☐ No ☒ NA
3. Did the treatment facility send a copy of the generator's demonstration and certification to the receiving treatment, recovery, or storage facility [Section 268.8(c)(2)]? ☐ Yes ☐ No ☒ NA
- d. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the restricted wastes are less than treatment standards or prohibition levels [Section 268.7(c)(2)]? ☐ Yes ☐ No ☒ NA
- e. Describe frequency of testing of treatment residuals.
- _____
- _____
- _____
- f. Was dilution used as a substitute for treatment [Section 268.3]? ☐ Yes ☐ No ☒ NA
- g. Are all notifications, certifications, and results of waste analyses kept in the operating record [Section 264.73(b) or Section 265.73(b)]? ☐ Yes ☐ No ☒ NA
- h. Are notices provided to land disposal facilities complete with Waste Number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [Section 268.7(b)(4) and (5) and Section 268.8(c)(1)]? ☐ Yes ☐ No ☒ NA
- i. If the waste or treatment residue will be further managed at another storage or treatment facility, has the treatment facility complied with the 268.7(a) notification and certification requirements applicable to generators [Section 268.7(b)(6)]? ☐ Yes ☐ No ☒ NA

7. Land Disposal

- a. Are restricted and/or prohibited wastes placed in land disposal units (landfills, surface impoundments*)

- waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vault or bunker?) ☐ Yes ☐ No ☒ NA
- b. Did facility have the notice and certification from generators/treaters in its operating record that all prohibited wastes disposed met standards for generation or treatment [Section 268.7(c)(1) and 268.7(a),(b)]? ☐ Yes ☐ No ☒ NA
- c. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [Section 268.7(c)(2)]? ☐ Yes ☐ No ☒ NA
- If yes, was the frequency of testing as required by the facility's waste analysis plan [Section 264.13 or 265.13]? ☐ Yes ☐ No ☒ NA
- d. Were prohibited wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units [268.30] excluding national capacity variances [268.30(a)]? ☐ Yes ☐ No ☒ NA
- If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case or capacity extension [268.5] or treatment standard variance [268.44][Section 268.30(d), Section 268.31(d), Section 268.32(g), Section 268.33(e)]? ☐ Yes ☐ No ☒ NA
- e. Were restricted wastes subject to a national capacity variance or case-by-case extension disposed? ☐ Yes ☐ No ☒ NA
- If yes, have the minimum technology requirements been met for all units receiving such wastes [Section 268.30(c), 268.31(c), 268.32(d), 268.33(d)]? ☐ Yes ☐ No ☒ NA
- f. Were adequate records of disposal maintained [Section 264.73(b) or 265.73(b)]? ☐ Yes ☐ No ☒ NA
- g. If wastes subject to a nationwide variances, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have generator's notices [268.7(a)(3)] and records of disposal? [Section 264.73(b) or Section 265.73(b)] ☐ Yes ☐ No ☒ NA
- h. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports? ☐ Yes ☐ No ☒ NA

i. If the owner/operator is disposing of a soft-hammer waste, is he maintaining the generators and treaters (if applicable) notices and certifications [Section 268.8(a)(2)-(a)(4)]?

__Yes __No ☒ NA

1. Is the facility disposing of any soft hammer wastes that may be classified as California wastes?

__Yes __No ☒ NA

2. Did the facility seek to verify whether these wastes may be subject to all restrictions, e.g., California ban?

__Yes __No ☒ NA

Section F - Special Conditions

1. Has generator received from or transported to a foreign Administrator? ☐ Yes ☒ No ☐ NA
- a. If yes, has he filed a notice with the Regional Administrator? ☐ Yes ☐ No ☒ NA
- b. Is this waste manifested and signed by a foreign cosignee? ☐ Yes ☐ No ☒ NA
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? ☐ Yes ☐ No ☒ NA

Part ____

SURFACE IMPOUNDMENTS CHECKLIST

Section A - Design Requirements (264.221) (265.221)

1. Does facility operate one or more surface impoundments? ☐ Yes ☒ No ☐ NA
- a. If yes, has owner/operator installed two or more liners and a leachate collection system for any new units, replacement of any existing units, or lateral expansion of units? ☐ Yes ☐ No ☒ NA
- b. Is owner/operator exempt from double-liner leachate collection system requirements because Regional Administrator has determined that impoundment's design will prevent the migration of hazardous constituents? ☐ Yes ☐ No ☒ NA
- c. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)? ☐ Yes ☐ No ☒ NA
- d. If impoundment does not have a double liner, is it exempt due to one of the following reasons? ☐ Yes ☐ No ☒ NA
1. Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand.
 2. Monofill has at least one liner for which there is no evidence of leaking.
 3. Monofill is located, designed, and operated to ensure that no migration of constituents into ground or surface water occurs.
- e. Does owner/operator take measures to prevent overfilling; wind and wave action; rainfall; run-on; malfunctions of level controllers, alarms, and other equipment; and human error (Part 264)? ☐ Yes ☐ No ☒ NA
- f. Is impoundment surrounded by dikes (Part 264)? ☐ Yes ☐ No ☒ NA

Section B - Operating Requirements

1. Does owner/operator maintain at least 60 cm (2 ft) of freeboard (Part 265)? (265.222)
2. Does owner/operator have certification from a qualified engineer that alternate design features will prevent overtopping? (Part 265) (265.222) ☐ Yes ☐ No ☒ NA

Section C - Containment Systems

1. Do all dikes have a protective cover such as grass, shale or rock? (Part 265) (265.223)

__Yes __No ☒ NA

Section D - Waste Analysis and Trial Tests

1. Will the surface impoundment be used to: (265.225)

- a. Chemically treat a hazardous waste which is substantially different from wastes previously treated in the impoundment? (Part 265)
- b. Chemically treat hazardous waste with a substantially different process than any previously used in that impoundment?

__Yes __No ☒ NA

__Yes __No ☒ NA

2. If the answer in #1 was yes to any questions, has the owner/operator:

- a. Conducted waste analysis or trial treatment tests?
- b. Obtained written, documented information on treatment of similar wastes under similar operating conditions?

__Yes __No ☒ NA

__Yes __No ☒ NA

Section E - Inspections and Monitoring

1. Does the owner/operator:

- a. Inspect the freeboard at least one each operating day? (265.226)
- b. Inspect the surface impoundment including dikes and vegetation at least once per week and after storms? (264.226) (265.226)

__Yes __No ☒ NA

__Yes __No ☒ NA

2. Have any deteriorations or malfunctions that have been found been remediated?

__Yes __No ☒ NA

3. Has the owner/operator obtained a certification from a qualified engineer that the impoundments dike has structural integrity? (264.226)

__Yes __No ☒ NA

Section F - Emergency Repairs, Contingency Plans (Part 264) (264.227)

1. Does facility have a contingency plan?

__Yes __No ☒ NA

- a. If yes, does plan stipulate that impoundment be removed from service under the following conditions:

1. Sudden drop in liquid level?

__Yes __No ☒ NA

2. Leaking dike? ☐ Yes ☐ No ☒ NA
- b. Does plan detail the steps to be followed when removing impoundment from service, including:
1. Shutting off flow into impoundment? ☐ Yes ☐ No ☒ NA
 2. Containing any surface leakage? ☐ Yes ☐ No ☒ NA
 3. Stopping the leak? ☐ Yes ☐ No ☒ NA
 4. Notifying Regional Administrator of problems in writing if leaks cannot be contained? ☐ Yes ☐ No ☒ NA
- c. If impoundment was removed from service, did owner/operator take the necessary precautions to rectify problems before restoring impoundment to service? ☐ Yes ☐ No ☒ NA
- d. If impoundment was removed from service and was not restored to service, was impoundment closed in accordance with an approved closure plan? ☐ Yes ☐ No ☒ NA

Section G - Closure and Post-Closure (264.228) (265.228)

1. Is a closure plan retained at the facility? ☒ Yes ☐ No ☐ NA
2. At closure, did owner/operator:
- a. Remove standing liquids (Part 265)? ☒ Yes ☐ No ☐ NA
 - b. Remove waste and waste residue (Part 265)? ☒ Yes ☐ No ☐ NA
 - c. Remove liner (Part 265)? ☒ Yes ☐ No ☐ NA
 - d. Remove underlying and surrounding contaminated soil? ☐ Yes ☒ No ☐ NA
 - e. If not, did owner/operator demonstrate to Regional Administrator that the above materials were non-hazardous (Part 265)? ☐ Yes ☐ No ☐ NA
1. If no, has owner/operator closed the impoundment and provided post-closure care (Part 265)? ☐ Yes ☐ No ☐ NA
3. If regulated under Part 264, has owner/operator: (264.228)
- a. Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment, and managed them as hazardous waste? ☐ Yes ☐ No ☐ NA
 - b. Eliminated free liquids by removing or solidifying remaining wastes or waste residues? ☐ Yes ☐ No ☐ NA
 - c. Stabilized remaining wastes to a bearing capacity sufficient to support final cover? ☐ Yes ☐ No ☐ NA
 - d. Covered the impoundment with final cover? ☐ Yes ☐ No ☐ NA
4. Did owner/operator leave any residuals in place at closure (Part 264)? (264.228) ☒ Yes ☐ No ☐ NA

5. In post-closure, does owner/operator maintain integrity of cover and groundwater monitoring system, and prevent runoff and runoff? (264.228) (265.228)

☒ Yes ☐ No ☐ NA

Section H - Ignitable and Reactive Wastes (264.229) (265.229)

1. Are ignitable or reactive wastes placed in the impoundment?

☐ Yes ☐ No ☒ NA

- a. If yes, are they treated, rendered, or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive?

☐ Yes ☐ No ☒ NA

OR

- b. Is the impoundment used solely for emergencies?

☐ Yes ☐ No ☒ NA

Section I - Incompatible Wastes

(264.230) (265.230)

1. Are incompatible wastes placed in the impoundment?

☐ Yes ☐ No ☒ NA

Part ____

GROUNDWATER MONITORING CHECKLIST

Section A - Monitoring System

1. Does the facility have a groundwater monitoring system in operation? ☒ Yes ___ No ___ NA
- a. If yes, does the system consist of: (265.91)(264.97)
1. At least one upgradient/background well? ☒ Yes ___ No ___ NA
2. At least three downgradient wells? ☒ Yes ___ No ___ NA
- b. Are wells identified in the field? ☒ Yes ___ No ___ NA
- c. Are well heads in good condition (i.e. free of cracks)? ☒ Yes ___ No ___ NA
- d. Are well heads locked? ☒ Yes ___ No ___ NA
- e. Do well heads have bumper guards or are otherwise protected? ☒ Yes ___ No ___ NA

Section B - Sampling and Analysis (Part 264)

1. Does the facility obtain and analyze samples from the groundwater monitoring system? ☒ Yes ___ No ___ NA
2. Has facility developed and followed a groundwater sampling and analysis plan? (264.97(d)) ☒ Yes ___ No ___ NA
- a. If yes, does this plan include procedures and techniques for:
1. Sample collection? ☒ Yes ___ No ___ NA
2. Sample preservation? ☒ Yes ___ No ___ NA
3. Analytical procedures? ☒ Yes ___ No ___ NA
4. Chain-of-custody control? ☒ Yes ___ No ___ NA
5. Determining the groundwater surface elevation? ☒ Yes ___ No ___ NA
3. Has facility specified a statistical method to be used in evaluating groundwater monitoring data? ___ Yes ___ No ☒ NA
4. Is all groundwater monitoring data recorded in the operating record? ☒ Yes ___ No ___ NA

Section C - Detection Monitoring Program (264.98)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases?

☐ Yes ☐ No ☒ NA

- a. If yes, are the following components included in the system:

1. Background values?

☐ Yes ☐ No ☒ NA

2. Determination of groundwater flow rate and direction annually? (264.98(e))

☐ Yes ☐ No ☒ NA

3. Determination of statistically significant increases over background concentrations at each well? (264.98(f))

☐ Yes ☐ No ☒ NA

4. If there was a statistically significant increase indicated, did the facility notify the Executive Director per 264.98(g)(1)?

☐ Yes ☐ No ☒ NA

5. Did facility attempt to demonstrate an apparent increase was not caused by a regulated unit per MHWMR 264.98(g)(6)?

☐ Yes ☐ No ☒ NA

6. Is all information contained in the facility's operating record?

☐ Yes ☐ No ☒ NA

Section D - Compliance Monitoring Program (264.99)

1. Does the facility operate a compliance monitoring program?

☐ Yes ☐ No ☒ NA

- a. If yes, does the facility:

1. Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e))

☐ Yes ☐ No ☒ NA

2. Collect at least four samples from each well at least semi-annually? (264.99(f))

☐ Yes ☐ No ☒ NA

3. Determine whether there is statistically significant evidence of increased contamination at each monitoring well?

☐ Yes ☐ No ☒ NA

4. If an increase was indicated, did facility notify the Executive Director?

☐ Yes ☐ No ☒ NA

5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually?

☐ Yes ☐ No ☒ NA

6. Record all information in the operating record?

☐ Yes ☐ No ☒ NA

Section E - Corrective Action Program (Part 264 only) (264.100)

1. Does facility follow a corrective action program that meets the facility's permit requirements?

☒ Yes ☐ No ☐ NA

Section F - Sampling and Analysis (Part 265)

1. Has the facility developed and followed a groundwater sampling and analysis plan? ☐ Yes ☐ No ☒ NA
- a. If yes, does the plan include procedures and techniques for:
- 1. Sample collection? ☐ Yes ☐ No ☒ NA
 - 2. Sample preservation? ☐ Yes ☐ No ☒ NA
 - 3. Analytical procedure? ☐ Yes ☐ No ☒ NA
 - 4. Chain-of-custody control? ☐ Yes ☐ No ☒ NA
2. Has the owner/operator established initial background concentrations or values of all parameters specified in 265.92(b)? ☐ Yes ☐ No ☒ NA
- a. Samples collected to establish background quality (from above)? ☐ Yes ☐ No ☒ NA
- b. Samples collected to indicate contamination (from above)? ☐ Yes ☐ No ☒ NA
- c. Elevation of groundwater surface at each monitoring well at each sampling event? ☐ Yes ☐ No ☒ NA

Section G - Preparation, Evaluation, and Response (Part 265 only) (265.93)

1. Did owner/operator prepare an outline of a groundwater quality assessment program? ☐ Yes ☐ No ☒ NA
- a. If yes, did program determine the following:
- 1. Whether hazardous waste or hazardous waste constituents have entered the groundwater? ☐ Yes ☐ No ☒ NA
 - 2. Rate and extent of hazardous waste or hazardous waste constituent migration? ☐ Yes ☐ No ☒ NA
 - 3. Concentrations of hazardous waste or hazardous waste constituents in groundwater? ☐ Yes ☐ No ☒ NA
- b. For each well, has owner/operator calculated the arithmetic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean? ☐ Yes ☐ No ☒ NA
- c. Has owner/operator submitted information documenting any significant increase in comparisons for up-gradient wells (or decrease in pH)? ☐ Yes ☐ No ☒ NA
- d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional groundwater samples from

those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error)

__Yes __No NA

1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days?

__Yes __No NA

2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Executive Director within 15 days after notification (discussed above) a certified groundwater quality assessment program?

__Yes __No NA

3. Did owner/operator implement the groundwater quality assessment program and, at a minimum, did he determine the following:

__Yes __No NA

- a. Rate and extent of migration of the hazardous waste constituents in the groundwater?

__Yes __No NA

- b. Concentrations of the hazardous waste in the groundwater?

__Yes __No NA

4. Did owner/operator submit a report to the Executive Director containing the requests of the assessment outlined in No. 3 above within 15 days?

__Yes __No NA

5. Did owner/operator notify the Executive Director of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the groundwater?

__Yes __No NA

6. If owner/operator determined that hazardous waste or hazardous waste constituents entered the groundwater, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or groundwater quality assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if groundwater quality assessment plan was implemented during post-closure?

__Yes __No NA

7. If any groundwater quality assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed program and reported to the Executive Director, as outlined in No. 4 above?

__Yes __No NA

8. If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on groundwater elevation

obtained under No. 3c in Section F above
to determine whether the requirements for
locating monitoring wells are satisfied?

___ Yes ___ No NA

- a. If evaluation shows that the requirements
for monitoring wells are not satisfied,
has owner/operator modified the number,
location, or depth of the monitoring wells
to bring the system into compliance?

___ Yes ___ No NA

Section H - Recordkeeping and Reporting (Part 265 only) (265.94)

1. Unless owner/operator is monitoring to satisfy the
requirements of Section 265.93(d)(4), does owner/
operator:

- a. Keep records of the analyses required in Section
265.92(c) and (d), groundwater surface elevations
required in 265.93(b) throughout the active life
of the facility and throughout post-closure?
- b. Report the following information to the Executive
Director:

___ Yes ___ No NA

1. Within 15 days of analysis for each quarterly
sampling event, does owner/operator submit
results of background concentrations?
2. Does owner/operator inform the Executive
Director about any parameters that exceed
maximum contaminant levels listed in Appendix
III?
3. (Annually) does owner/operator report
concentrations or values of parameters listed
in Section 265.92(b)(3) for each well, including
required evaluations for these parameters under
Section 265.93(b)?

___ Yes ___ No NA

___ Yes ___ No NA

___ Yes ___ No NA

- a. Does owner/operator also identify
differences from initial background
concentrations found in the upgradient
wells no later than March 1 following
each calendar year?

___ Yes ___ No NA

2. Does owner/operator submit results of the groundwater
surface elevations under Section 265.93(f), along with
a description of the response, if needed?

___ Yes ___ No NA

3. If groundwater is monitored to satisfy requirements of Section 265.93(d)(4), did owner/operator do the following:

a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure?

__Yes __No ☒ NA

b. (Annually, until final closure) submit to the Regional Administrator a report containing the results of the groundwater quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1?

__Yes __No ☒ NA

Part ____

FINANCIAL REQUIREMENTS CHECKLIST

Section A - Closure

1. Is facility required to provide financial assurance for closure? Yes ☒ No ☐ NA ☐
- a. Type of financial assurance _____
- b. Amount of closure costs _____
1. Date of most recent adjustment _____
- c. Effective date of mechanism _____
- d. Expiration date of mechanism _____
- e. Is instrument adequate? Yes ☐ No ☐ NA ☐

Section B - Post-Closure

1. Is facility required to provide financial assurance for post-closure care? Yes ☒ No ☐ NA ☐
- a. Type of financial assurance Financial Test
- b. Amount of closure costs _____
1. Date of most recent adjustment _____
- c. Effective date of mechanism April 1, 1993
- d. Expiration date of mechanism April 1, 1994
- e. Is instrument adequate? Yes ☒ No ☐ NA ☐

Section C - Corrective Action

1. Is facility required to provide financial assurance for corrective action? Yes ☒ No ☐ NA ☐
- a. Type of financial assurance Financial Test
- b. Amount of closure costs _____
1. Date of most recent adjustment _____
- c. Effective date of mechanism April 1, 1993
- d. Expiration date of mechanism April 1, 1994
- e. Is instrument adequate? Yes ☒ No ☐ NA ☐

Section D - Liability Requirements

1. Is facility required to provide liability coverage for sudden accidental occurrences? Yes ☒ No ☐ NA ☐
- a. Type of assurance Financial Test
- b. Is amount at least \$1 million per occurrence, \$2 million annual aggregate? Yes ☒ No ☐ NA ☐
- c. Effective date of mechanism April 1, 1992

d. Expiration date of mechanism

April 1, 1994

2. Is facility required to provide liability coverage for non-sudden accidental occurrences?

 Yes No NA

a. Type of assurance

b. Is amount at least \$3 million per occurrence, \$6 million annual aggregate?

 Yes No NA

c. Effective date of mechanism

d. Expiration date of mechanism

CHCKLIST:lr



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

July 8, 1992

CERTIFIED MAIL NO. P 046 601 386

Mr. John Getz
Plant Manager
Kerr-McGee Chemical Corporation
P. O. Box 906
Columbus, Mississippi 39701

Re: Compliance Evaluation
Inspection, June 30, 1992
Kerr-McGee Chemical Corp.
Columbus, Mississippi

Dear Mr. Getz:

Enclosed please find an inspection report and checklist that was completed as a result of a Compliance Evaluation Inspection (CEI) at the above referenced facility. The inspection revealed that the facility was in compliance with the applicable regulations and the facility's Hazardous Waste Management Permit.

Should you have any questions, please contact me at (601) 961-5141.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bruce Ferguson", with a long horizontal flourish extending to the right.

Bruce Ferguson
Hazardous Waste Division

enclosures

cc: Mr. G. Alan Farmer, EPA (w/enclosures)

RCRA Compliance Evaluation Inspection Report

1. Inspector and Author of Report

Bruce Ferguson, Environmental Engineer-in-Training
Mississippi Office of Pollution Control

2. Facility Information

Kerr-McGee Chemical Corporation
Forest Products Division
P. O. Box 906
Columbus, Mississippi 39701
MSD990866329

3. Responsible Company Official

Mr. John Getz, Plant Manager
Kerr-McGee Chemical Corporation

4. Inspection Participants

Bruce Ferguson, MOPC
John Getz, KMCC
Tony Helms, KMCC

5. Date and Time of Inspection

June 30, 1992, 12:30 p.m., CST

6. Applicable Requirements

Mississippi Hazardous Waste Management Regulations (MHWMR) Parts 262, 264, 268 and the facility's Hazardous Waste Post-Closure Permit (MHWMP) No. HW-90-139-01.

7. Purpose of Inspection

A Compliance Evaluation Inspection (CEI) was performed to determine the facility's overall compliance with applicable regulations and the facility's Hazardous Waste Management Permit.

8. Facility Description

The site now occupied by Kerr-McGee Chemical Corporation (KMCC) has been used as a wood treating facility since 1928. KMCC acquired the site in 1964 and continues to produce treated railroad ties, switch ties, crossings, and pilings using creosote as a preservative. Pentachlorophenol was also used as a preservative prior to 1976.

The facility is permitted to conduct post-closure and groundwater corrective action activities. In June of 1986, KMCC certified closure of two hazardous waste surface impoundments - an aeration

impoundment and a sedimentation impoundment in which bottom sediment sludge from process wastewater accumulated. The surface impoundments were replaced by upgrading production process oil/water separators to recycle preservatives for reapplication within the production process. The wastewater is then pumped to the wastewater treatment system which operates under a pre-treatment permit and is discharged to the City POTW.

Presently the groundwater corrective action system consists of eight groundwater recovery wells. Recovered groundwater is pumped to the process oil/water separator and on to the wastewater treatment system. Proposals to expand the groundwater corrective action system in the product storage area and offsite in the cemetery south of the facility have been submitted to the MOPC.

In 1988, KMCC installed a concrete drip track to collect excess preservative dripping from treated wood after removal from the pressure cylinder. In December of 1991, the drip track was certified by a professional engineer that the track met the requirements of 40 CFR 264.571. Wastes generated from the drip track are being handled as F034 wastes, however, are not technically F034 waste since Mississippi has not adopted the wood treating regulations.

Currently there are no hazardous wastes generated at the facility. Upon adoption of the wood treating regulations by the State of Mississippi, the facility will generate F034 waste.

9. Findings

All required documentation was available at the facility and was in order. These records included inspection records for the closed surface impoundments and the drip track, the contingency plan, personnel training, financial documents and the waste analysis plan. Groundwater monitoring data was not inspected on the day of the inspection, however, the documentation was viewed to be present during meetings at the facility in April. All the documentation was in order with the exception that the sampling and analysis plan, which was contained in the waste analysis plan, was not the most current sampling and analysis plan.

Inspection of the closed surface impoundment indicated no erosion of the impoundment cap. Tony Helms had indicated that repairs had recently been made to the cap because of erosion caused by heavy rains. The impoundment was enclosed on all sides by a six foot high chain link fence and warning signs were posted from all directions. Each monitor well was not inspected on the day of the inspection, however, each well has been inspected during several site visits since February 1992. The monitor wells on site are above ground completions with metal protective casings and are kept locked. The monitor wells off site are flush mount completions and are kept locked. All monitor wells are completed with concrete protective pads.


10. Conclusions

The facility was in compliance with the applicable regulations and the Hazardous Waste Management Permit on the day of the inspection. It is recommended that the old sampling and analysis plan be discarded and replaced with the updated version in the waste analysis plan.

11. Signed


Bruce Ferguson, Inspector

7/2/92
Date


Jerry Banks, Supervisor

7/2/92
Date

Part 1

General Site Information

Facility Name: Kerr-McGee Chemical Corporation
Address: Columbus, Mississippi
I.D. Number: MSD990866329
Contact: John Getz
Title: Plant Manager
Phone Number: _____

Type of Ownership:

___ Federal ___ State ___ County ___ Municipal ☒ Private

Facility Status:

☒ Generator ___ Transporter ☒ Treatment ___ Storage ___ Disposal

Regulatory Status:

___ Interim Status ___ Part B Submitted
☒ Permitted ___ Part B in Preparation

Principal Inspector Name: BRUCE FERGUSON Title: Environmental Engineer EIT
Organization: MS DEQ Phone Number: 601-961-5141

Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Representing</u>
<u>Bruce Ferguson</u>	<u>Environmental Eng.</u>	<u>MS DEQ</u>
<u>John Getz</u>	<u>Plant Manager</u>	<u>KMCC</u>
<u>Tim Helms</u>	<u>Asst Plant Mgr</u>	<u>KMCC</u>

Part 1

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? X Yes ___ No ___ NA

a. If yes, EPA I.D. No. M S D 9 9 0 8 6 6 3 2 9
If no, explain.

2. Has facility received hazardous waste from a foreign source? Yes ☒ No ☐ NA

a. If yes, has it filed a notice with the Regional Administrator? Yes No ☒ NA

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ☒ Yes ☐ No ☐ NA

a. If yes, does it include: (264.13) (265.13)

1. Parameters for which each waste will be analyzed? ☒ Yes ☐ No ☐ NA
2. Test methods used to test for these parameters? ☒ Yes ☐ No ☐ NA
3. Sampling method used to obtain sample? ☒ Yes ☐ No ☐ NA
4. Frequency with which the initial analyses will be reviewed or repeated? ☐ Yes ☐ No ☒ NA
5. (For offsite facilities) waste analyses that generators have agreed to supply? ☐ Yes ☐ No ☒ NA
6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:

a. Procedures to be used to determine the identity of each movement of waste. ☒ Yes ☐ No ☐ NA

b. Sampling method to be used to obtain representative sample of the waste to be identified. X Yes No NA

4. Does the facility provide adequate security through: (264.14) (265.14)

a. 24-hour surveillance system (e.g., television monitoring or guards)? ☒ Yes ☐ No ☐ NA

OR

- b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)? ☒ Yes ☐ No ☐ NA

Describe FENCE (guards)

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? ☒ Yes ☐ No ☐ NA

Describe Guard

General Inspection Requirements (264.15) (265.15)

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

- a. Monitoring equipment? ☒ Yes ☐ No ☐ NA
b. Safety and emergency equipment? ☒ Yes ☐ No ☐ NA
c. Security devices: ☒ Yes ☐ No ☐ NA
d. Operating and structural equipment? ☒ Yes ☐ No ☐ NA
e. Types of problems of equipment:

1. Malfunction ☒ Yes ☐ No ☐ NA
2. Operator error ☒ Yes ☐ No ☐ NA
3. Discharges ☒ Yes ☐ No ☐ NA

6. Does the owner/operator maintain an inspection log? ☐ Yes ☐ No ☐ NA

- a. If yes, does it include:

1. Date and time of inspection? ☐ Yes ☐ No ☐ NA
2. Name of inspector? ☐ Yes ☐ No ☐ NA
3. Notation of observations? ☐ Yes ☐ No ☐ NA
4. Date and nature of repairs or remedial action? ☐ Yes ☐ No ☐ NA
5. Identification of potential problems? ☐ Yes ☐ No ☐ NA

- b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) ☐ Yes ☐ No ☐ NA

- c. Are records kept a minimum of three years? ☒ Yes ☐ No ☐ NA

Personnel Training (264.16) (265.16)

7. Does the owner/operator maintain personnel training records at the facility? ☒ Yes ☐ No ☐ NA

Date of most recent training: June 29, 1992

How long are they kept?

indefinite

a. If yes, do they include:

1. Job title and written job description of each position?
2. Description of type and amount of training?
3. Records of training given to facility personnel?

☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA
☒ Yes ☐ No ☐ NA

Requirements for Ignitable, Reactive, or Incompatible Waste
(264.17) (265.17)

8. Does facility handle ignitable or reactive wastes?

☐ Yes ☒ No ☐ NA

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flames confined to specifically designated locations?

☒ Yes ☐ No ☐ NA

c. Are "No Smoking" signs posted in hazardous areas?

☐ Yes ☐ No ☐ NA

d. Are precautions documented (Part 264 only)?

☐ Yes ☐ No ☐ NA

9. Check containers

a. Are containers leaking or corroding?

☐ Yes ☐ No ☒ NA

b. Is there evidence of heat generation from incompatible wastes?

☐ Yes ☐ No ☒ NA

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31)

☐ Yes ☒ No ☐ NA

If yes, use narrative explanation sheet to explain.

2. Is the facility equipped with: (264.32) (265.32)

a. Internal communication or alarm system?

☒ Yes ☐ No ☐ NA

1. Is it easily accessible in case of emergency?

☒ Yes ☐ No ☐ NA

b. Telephone or two-way radio to call emergency response personnel?

☒ Yes ☐ No ☐ NA

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?

☒ Yes ☐ No ☐ NA

d. Water of adequate volume of hoses, sprinklers, or water spray system?

☒ Yes ☐ No ☐ NA

1. Describe source of water

CITY WATER

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35) (265.35)

☒ Yes ☐ No ☐ NA

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.)

(264.37) (265.37)

☐ Yes ☐ No ☐ NA

5. In the case that more than one police or fire department might respond, is there a designated primary authority?

(264.37) (265.37)

☐ Yes ☐ No ☒ NA

a. If yes, name primary authority _____

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers?.

(264.37) (265.37)

☒ Yes ☐ No ☐ NA

a. Are they readily available to all personnel?

☒ Yes ☐ No ☐ NA

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (264.37)

(265.37)

☒ Yes ☐ No ☐ NA

8. If State or local authorities declined to enter into agreements, is this entered in the operating record?

(264.37) (265.37)

☐ Yes ☐ No ☒ NA

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? ☒ Yes ☐ No ☐ NA
(264.53) (265.53)
- a. If yes, is it a revised SPCC Plan? ☐ Yes ☐ No ☐ NA
- b. Does contingency plan include: (264.52) (265.52)
1. Arrangements with local emergency response organizations? ☒ Yes ☐ No ☐ NA
2. Emergency coordinator's names, phone numbers and addresses? ☒ Yes ☐ No ☐ NA
3. List of all emergency equipment at facility and descriptions of equipment? ☒ Yes ☐ No ☐ NA
4. Evacuation plan for facility personnel? ☒ Yes ☐ No ☐ NA
2. Is there an emergency coordinator on site or on call at all times? (264.55) (265.55) ☒ Yes ☐ No ☐ NA

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, does the owner/operator retain copies of all manifests? ☐ Yes ☐ No ☒ NA
1. Are the manifests signed and dated and returned to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71) ☐ Yes ☒ No ☐ NA
- a. If yes, is it accompanied by a shipping paper? ☐ Yes ☐ No ☒ NA
1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ☐ Yes ☐ No ☒ NA
2. Is a signed copy given to the transporter? ☐ Yes ☐ No ☒ NA
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72) ☐ Yes ☒ No ☐ NA
- a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? ☐ Yes ☐ No ☒ NA
1. If no, has Regional Administrator been notified? ☐ Yes ☐ No ☒ NA

4. Does the owner/operator keep a written operating record at the facility? (264.73) (265.73)

☒ Yes ☐ No ☒ NA

a. If yes, does it include:

1. Description and quantity of each hazardous waste received? ☐ Yes ☐ No ☒ NA
2. Methods and dates of treatment, storage, and disposal? ☐ Yes ☐ No ☒ NA
3. Location and quantity of each hazardous waste at each location? ☐ Yes ☐ No ☒ NA
4. Cross-references to manifests/shipping papers? ☐ Yes ☐ No ☒ NA
5. Records and results of waste analyses? ☐ Yes ☐ No ☒ NA
6. Report of incidents involving implementation of the contingency plan? ☐ Yes ☐ No ☒ NA
7. Records and results of required inspections? ☐ Yes ☐ No ☒ NA
8. Monitoring, testing, and analytical data, for groundwater required by Subpart F? ☐ Yes ☐ No ☒ NA
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? ☐ Yes ☐ No ☒ NA
10. Notices of generators as specified in Section 264.12(b) (Part 264)? ☐ Yes ☐ No ☒ NA

b. Does facility have copy of permit on site?

☒ Yes ☐ No ☐ NA

5. Does the facility submit a ²⁰⁰⁰~~biennial~~ report by March 1 every even-numbered year? (264.75) (265.75)

☒ Yes ☐ No ☐ NA

a. If yes, do reports contain the following information:

1. EPA I.D. number? ☒ Yes ☐ No ☐ NA
2. Date and year covered by report? ☒ Yes ☐ No ☐ NA
3. Description/quantity of hazardous waste? ☒ Yes ☐ No ☐ NA
4. Treatment, storage, and disposal methods? ☒ Yes ☐ No ☐ NA
5. Monitoring data under Section 265.94(a)(2) and (b)(2) (Part 265)? ☒ Yes ☐ No ☐ NA
6. Most recent closure and post-closure cost estimates? ☒ Yes ☐ No ☐ NA
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? ☒ Yes ☐ No ☐ NA
8. Certification signed by owner/operator? ☒ Yes ☐ No ☐ NA

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (264.76) (265.76)

☐ Yes ☒ No ☐ NA

a. If yes, has he submitted an unmanifested waste report to the Executive Director?

☐ Yes ☐ No ☒ NA

7. Does the facility submit to the Executive Director reports on releases, fires, and explosions; contamination and monitoring data; and facility closure?

☒ Yes ☐ No ☐ NA

Part ____

LAND DISPOSAL RESTRICTIONS CHECKLIST

Section A - General

1. Are hazardous wastes land-disposed on site? ☐ Yes ☒ No ☐ NA
 - a. If yes, are one or more of the following circumstances true:
 1. Granted extension from effective date pursuant to Section 268.5? ☐ Yes ☐ No ☒ NA
 2. Granted exemption from a prohibition pursuant to a petition under Section 268.6? ☐ Yes ☐ No ☒ NA
 3. Disposing of soil or debris resulting from a CERCLA response action or a RCRA corrective action, which will not be prohibited until November 8, 1988? ☐ Yes ☐ No ☒ NA
 4. Facility is a small quantity generator of less than 100 kg of hazardous waste per month? ☐ Yes ☐ No ☒ NA
 5. Wastes not yet prohibited by Part 268? ☐ Yes ☐ No ☒ NA
2. Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal? ☐ Yes ☐ No ☐ NA
3. Are there active surface impoundments used for treatment of hazardous wastes? ☐ Yes ☒ No ☐ NA
 - a. If yes, does the unit's design and operation meet the requirements set forth in Section 268.4? ☐ Yes ☐ No ☒ NA
4. Has the facility sought exemption from any prohibition under Subpart C of Section 268 for the disposal of a restricted hazardous waste? ☐ Yes ☒ No ☐ NA
 - a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis, comprehensive environmental characterization of unit site, QA/QC plan, sampling, testing, modeling)? ☐ Yes ☐ No ☒ NA
5. Has the facility determined whether it generates a restricted waste through waste analysis? (268.7) ☒ Yes ☐ No ☐ NA
 - a. If yes, is the facility, in fact, handling a restricted waste(s)? ☐ Yes ☒ No ☐ NA
 - b. If yes, does the restricted waste required treatment? ☐ Yes ☒ No ☐ NA

- c. If yes, has the generator notified the treatment facility in writing, and does the notification include all required components (EPA hazardous waste number, corresponding treatment standard, manifest number of shipment)? ☐ Yes ☒ No ☐ NA
6. Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? (268.10) ☐ Yes ☒ No ☐ NA
- a. If yes, do any of the following conditions apply:
1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? ☐ Yes ☐ No ☒ NA
 2. The solvent waste is generated from a CERCLA response corrective action? ☐ Yes ☐ No ☒ NA
 3. The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. ☐ Yes ☐ No ☒ NA
- b. If no, have any of these restricted wastes began land-disposed (except in an injection well) since November 8, 1986? ☐ Yes ☐ No ☒ NA
7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? ☐ Yes ☒ No ☐ NA
- a. If yes, do any of the following conditions apply:
1. Wastes are treated to meet standards of Subpart D of Section 268? ☐ Yes ☐ No ☒ NA
 2. Wastes are disposed of at a facility that has been granted a petition? ☐ Yes ☐ No ☒ NA
 3. An extension has been granted? ☐ Yes ☐ No ☒ NA
- b. If no, were these restricted wastes land disposed after November 8, 1988? ☐ Yes ☐ No ☒ NA
8. Are restricted wastes being treated? ☐ Yes ☒ No ☐ NA
- a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels? ☐ Yes ☐ No ☒ NA

Section B - Generator Compliance

1. Waste Identification

a. Does the generator handle the following wastes:

1. Solvent wastes

- (i) F001, F002, F004, or F005 ☐ Yes ☒ No ☐ NA
(ii) F003 ☐ Yes ☒ No ☐ NA

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☐ No ☒ NA

Note: Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially misclassified F-solvents, Appendix A-2 presents a list of corresponding F and U wastes.

2. Dioxin wastes (F020-F023, F026-F028) ☐ Yes ☒ No ☐ NA
3. Potential California List Wastes (see Appendix C) ☐ Yes ☒ No ☐ NA

- (i) D002 ☐ Yes ☒ No ☐ NA
(ii) D004-D011 ☐ Yes ☒ No ☐ NA
(iii) Any other waste characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ☐ Yes ☒ No ☐ NA

- (iv) Any F, K, P, or U wastes subject to "soft hammer" requirements that may qualify as California wastes due to HOCs, metals, or cyanide content? (See Appendix F) ☐ Yes ☒ No ☐ NA

4. First Third Wastes (See MHWMR 268.10) ☐ Yes ☒ No ☐ NA
5. Second Third Wastes (See MHWMR 268.11) ☐ Yes ☒ No ☐ NA
6. (Reserved)

- (i) Are any of the above "soft hammer" wastes? (See Appendices D & E) ☐ Yes ☒ No ☐ NA

2. BDAT Treatability Group - Treatment Standards Identification

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

☐ Yes ☒ No ☐ NA

- b. If yes, did the generator select the most stringent treatment standard for the constituent of concern [Section 268.41(b)]?

☐ Yes ☐ No ☒ NA

c. F Solvents

Did the generator correctly determine the appropriate treatability group [Section 268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

☐ Yes ☐ No ☒ NA

d. California Wastes

Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [Section 268.32(a)(3)]?

☐ Yes ☐ No ☒ NA

e. First and Second Third Waste

1. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [Section 268.7(a)]?

☐ Yes ☐ No ☒ NA

2. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

☐ Yes ☐ No ☒ NA

3. Waste Analysis

- a. Did the generator determine whether the waste exceeds treatment standards based on Section 268.7(a):

1. Knowledge of wastes

☐ Yes ☐ No ☒ NA

- (i) List wastes for which "applied knowledge" was used:

2. TCLP

 Yes No NA

- (i) List wastes for which "TCLP" was used:

No wastes failed the TCLP

- (ii) MHWMR 268.41 lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP?

 Yes No ~~NA~~

If yes, list: _____

3. Total waste analysis

 Yes No ~~NA~~

4. If files were retained, describe content and basis of applied knowledge determination:

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

5. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [Section 264.13(a)(3)(i) or Section 265.13(a)(3)(i)]?

 Yes No ~~NA~~

- b. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [Section 268.7(a)(1)]?

List those that exceeded standards: _____

List those that did not exceed standards: _____

- c. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [Section 268.3]

__ Yes __ No ☒ NA

6. Has the generator conducted any testing of those hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes?

__ Yes __ No ☒ NA

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?

__ Yes __ No ☒ NA

4. Management

a. Onsite management

1. Were restricted wastes managed onsite?

__ Yes ☒ No __ NA

2. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?

__ Yes __ No ☒ NA

If yes, TSDF checklist must be completed.

b. Offsite Management

1. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

- (i) EPA Hazardous Waste Number?
(ii) Corresponding treatment standard?
(iii) Manifest number?
(iv) Waste analysis, if available?

__ Yes __ No ☒ NA
__ Yes __ No ☒ NA
__ Yes __ No ☒ NA
__ Yes __ No ☒ NA

Identify offsite treatment facilities _____

2. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

- (i) EPA hazardous waste I.D. number?
(ii) Corresponding treatment standard?

__ Yes __ No ☒ NA
__ Yes __ No ☒ NA

(iii) Manifest number

☐ Yes ☐ No ☒ NA

(iv) Certification regarding waste and that it meets treatment standards?

☐ Yes ☐ No ☒ NA

Identify land disposal facilities receiving the BDAT certified wastes _____

3. If the generator's waste is subject to a Section 268.5 case by case exemption, a Section 268.6 "no migration" exemption, or a nationwide variance does the generator's records indicate that he or she submits with each waste shipment [Section 268.7(a)(3)]:

(i) EPA Hazardous Waste Number?

☐ Yes ☐ No ☒ NA

(ii) Corresponding Treatment Standards?

☐ Yes ☐ No ☒ NA

(iii) All applicable prohibitions?

☐ Yes ☐ No ☒ NA

(iv) The manifest number?

☐ Yes ☐ No ☒ NA

(v) The date the wastes are subject to prohibitions?

☐ Yes ☐ No ☒ NA

(vi) Does generator keep records of all notifications/certifications send to offsite facilities?

☐ Yes ☐ No ☒ NA

List all prohibited wastes for which records are not provided per above [Section 268.7(a)(b)]:

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

4. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number?

☐ Yes ☐ No ☒ NA

Applicable prohibitions?

☐ Yes ☐ No ☒ NA

The manifest number?

☐ Yes ☐ No ☒ NA

Waste analysis data, where available?

☐ Yes ☐ No ☒ NA

(i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [Section 268.33(f)]?

☐ Yes ☐ No ☒ NA

If yes, list facility of destination and waste of concern [Section 268.8(a)(2)]

- (ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [Section 268.7(a)(2)]? ☐ Yes ☐ No ☒ NA
- (iii) Has the generator retained a copy of the demonstration on site [Section 268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No ☒ NA
- (iv) Has the generator retained copies of all Section 268.8 certifications sent to the TSDF [Section 268.7(a)(6)] ☐ Yes ☐ No ☒ NA
- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [Section 268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No ☒ NA
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [Section 268.8(b)(3)]? ☐ Yes ☐ No ☒ NA

5. Storage of Prohibited Waste

- a. Were prohibited wastes stored for greater than 90 days? ☐ Yes ☐ No ☒ NA

If yes, was facility operating as a TSD under interim status or final permit [Section 262.34(b)]? ☐ Yes ☐ No ☒ NA

If yes, TSDF Checklist must be completed.

6. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ☐ Yes ☐ No ☒ NA

If yes, list type of treatment unit and processes

If yes, TSDF checklist must be completed.

Section C - Treatment, Storage & Disposal Requirements

1. General

- a. Does the facility conduct waste analysis (total and TCLP) on-site or through a commercial laboratory?

- b. Describe the frequency of sampling conducted by the facility.

2. Treatment Facilities

- a. Has the treatment facility revised its waste analysis plan [Section 268.7(b)] to meet the requirements of Section 264.13 or 265.13?

 Yes No NA

- (i) Is the treatment facility conducting TCLP tests for wastes subject to treatment standards expressed as waste extracts per 268.7(b)(i)?

 Yes No NA

- (ii) Is the treatment facility using the paint filter test for the California waste residues [Section 268.7(b)(ii)]?

 Yes No NA

- (iii) Is the treatment facility testing the pH of California waste residues?

 Yes No NA

- (iv) Is the treatment facility testing concentrations (not extracts) in the waste residues for prohibited wastes with established treatment standards expressed as waste concentrations [Section 268.7(b)(3)]?

 Yes No NA

- (v) Is the treatment facility testing extracts of the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [Section 268.7(b)(1)]

 Yes No NA

3. Land Disposal Facilities

- a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]? ☐ Yes ☐ No ☒ NA
- b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [Section 268.7(c)(2)]? ☐ Yes ☐ No ☒ NA
- c. Are they being tested in conformance with the frequency specified in the waste analysis plan [Section 268.7(c)(3)]? ☐ Yes ☐ No ☒ NA
- d. Are the appropriate tests (TCLP vs. total waste) being used [Section 268.7(c)(2)]? ☐ Yes ☐ No ☒ NA

4. Storage (Section 268.50)

- a. Are restricted wastes exceeding treatment standards stored (excepting wastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)? ☐ Yes ☐ No ☒ NA
- b. Are all containers clearly marked to identify content and date(s) entering storage [Section 268.50(a)(2)]? ☐ Yes ☐ No ☒ NA
- c. Do operating records track the location, quantity and dates that wastes exceeding treatment standards entered and were removed from storage [Section 264.73 or Section 265.73]? ☐ Yes ☐ No ☒ NA
- d. Do operating records agree with container labeling? [Section 268.50(a)(2) or Section 264.73 or Section 265.73] ☐ Yes ☐ No ☒ NA
- e. Is waste exceeding treatment standards stored for less than 1 year? ☐ Yes ☐ No ☒ NA

If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☐ No ☒ NA

If yes, state how: _____

- f. Was/is waste exceeding treatment standards stored for more than one year? ☐ Yes ☐ No ☒ NA

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal:

5. Treatment in Surface Impoundments (Section 268.4)

- a. Are prohibited wastes placed in surface impoundments for treatment? ☐ Yes ☐ No ☒ NA
- b. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [Section 268.4(b) and Section 268.3]? ☐ Yes ☐ No ☒ NA
- c. Did the facility submit a certification of compliance with minimum technology and groundwater monitoring requirements, and the waste analysis plan to the Agency [Section 268.4(a)(4)]? ☐ Yes ☐ No ☒ NA
- d. Have the minimum technology requirements been met [Section 268.4(a)(4)]? ☐ Yes ☐ No ☒ NA
1. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [Section 268.4(a)(3)(iii)]? ☐ Yes ☐ No ☒ NA
- e. Have the Subpart F groundwater monitoring requirements been met [Section 268.4(a)(3)]? ☐ Yes ☐ No ☒ NA
- f. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [Section 268.4(a)(2)]? ☐ Yes ☐ No ☒ NA
- g. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels? ☐ Yes ☐ No ☒ NA
- h. Provide the frequency of analyses conducted on treatment residues: _____

Does the frequency meet the requirements of the waste analysis plan [Section 264.13 or Section 265.13]? ☐ Yes ☐ No ☒ NA

- i. Does the operating record adequately document the results of waste analyses performed [Section 264.13 or Section 265.13]? ☐ Yes ☐ No ☒ NA
- j. Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [Section 268.4(a)(2)(ii)]? ☐ Yes ☐ No ☒ NA
1. If answer to f is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) ☐ Yes ☐ No ☒ NA
- k. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ☐ Yes ☐ No ☒ NA
- l. When removed, were residues of restricted wastes managed subsequently in another surface impoundment? ☐ Yes ☐ No ☒ NA
1. Were these residues subject to a valid 268.8 certification? ☐ Yes ☐ No ☒ NA
- m. When removed, were wastes treated prior to disposal? ☐ Yes ☐ No ☒ NA
1. If yes, are waste residues treated on or offsite? ☐ Yes ☐ No ☒ NA
2. Identify management method: _____

6. Other Treatment

- a. Does the facility operate treatment units (regulated or exempt) (not including surface impoundments)? ☐ Yes ☐ No ☒ NA
- b. Describe the treatment processes, including exempt processes: _____

- c. Does the facility treat soft-hammered wastes? ☐ Yes ☐ No ☒ NA

1. If yes, is treatment occurring as described in the generator's certification/demonstration [Section 268.8(c)(1)]? ☐ Yes ☐ No ☒ NA
2. Did the treatment facility certify he treated the soft-hammered waste as per the generator's demonstration and maintain copies of all certifications [268.8(c)(1)]? ☐ Yes ☐ No ☒ NA
3. Did the treatment facility send a copy of the generator's demonstration and certification to the receiving treatment, recovery, or storage facility [Section 268.8(c)(2)]? ☐ Yes ☐ No ☒ NA
- d. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the restricted wastes are less than treatment standards or prohibition levels [Section 268.7(c)(2)]? ☐ Yes ☐ No ☒ NA
- e. Describe frequency of testing of treatment residuals.
- _____
- _____
- _____
- f. Was dilution used as a substitute for treatment [Section 268.3]? ☐ Yes ☐ No ☒ NA
- g. Are all notifications, certifications, and results of waste analyses kept in the operating record [Section 264.73(b) or Section 265.73(b)]? ☐ Yes ☐ No ☒ NA
- h. Are notices provided to land disposal facilities complete with Waste Number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [Section 268.7(b)(4) and (5) and Section 268.8(c)(1)]? ☐ Yes ☐ No ☒ NA
- i. If the waste or treatment residue will be further managed at another storage or treatment facility, has the treatment facility complied with the 268.7(a) notification and certification requirements applicable to generators [Section 268.7(b)(6)]? ☐ Yes ☐ No ☒ NA

7. Land Disposal

- a. Are restricted and/or prohibited wastes placed in land disposal units (landfills, surface impoundments*

waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vault or bunker?) ☐ Yes ☐ No ☒ NA

b. Did facility have the notice and certification from generators/treaters in its operating record that all prohibited wastes disposed met standards for generation or treatment [Section 268.7(c)(1) and 268.7(a),(b)]? ☐ Yes ☐ No ☒ NA

c. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [Section 268.7(c)(2)]? ☐ Yes ☐ No ☒ NA

If yes, was the frequency of testing as required by the facility's waste analysis plan [Section 264.13 or 265.13]? ☐ Yes ☐ No ☒ NA

d. Were prohibited wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units [268.30] excluding national capacity variances [268.30(a)]? ☐ Yes ☐ No ☒ NA

If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case or capacity extension [268.5] or treatment standard variance [268.44][Section 268.30(d), Section 268.31(d), Section 268.32(g), Section 268.33(e)]? ☐ Yes ☐ No ☒ NA

e. Were restricted wastes subject to a national capacity variance or case-by-case extension disposed? ☐ Yes ☐ No ☒ NA

If yes, have the minimum technology requirements been met for all units receiving such wastes [Section 268.30(c), 268.31(c), 268.32(d), 268.33(d)]? ☐ Yes ☐ No ☒ NA

f. Were adequate records of disposal maintained [Section 264.73(b) or 265.73(b)]? ☐ Yes ☐ No ☒ NA

g. If wastes subject to a nationwide variances, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have generator's notices [268.7(a)(3)] and records of disposal? [Section 264.73(b) or Section 265.73(b)] ☐ Yes ☐ No ☒ NA

h. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports? ☐ Yes ☐ No ☒ NA

- i. If the owner/operator is disposing of a soft-hammer waste, is he maintaining the generators and treaters (if applicable) notices and certifications [Section 268.8(a)(2)-(a)(4)]?

☐ Yes ☐ No ☒ NA

1. Is the facility disposing of any soft hammer wastes that may be classified as California wastes?

☐ Yes ☐ No ☒ NA

2. Did the facility seek to verify whether these wastes may be subject to all restrictions, e.g., California ban?

☐ Yes ☐ No ☒ NA

Part _____

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No.? (262.12) ☒ Yes ☐ No ☐ NA
- a. If yes, EPA I.D. No. 996866329

Section B - Manifest

1. Does generator ship waste offsite? (262.20) ☒ Yes ☐ No ☐ NA
- a. If no, do not fill out Sections B and D.
- b. If yes, identify primary offsite facility(s).
CHEMICAL WASTE MGMT CO
2. Does generator use manifest? (262.20) ☒ Yes ☐ No ☐ NA
- a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)? ☐ Yes ☐ No ☒ NA
1. If yes, does generator indicate this when sending waste to a TSD facility? ☐ Yes ☐ No ☒ NA
- b. If yes, does manifest include the following information? ☐ Yes ☐ No ☐ NA
1. Manifest document No. ☒ Yes ☐ No ☐ NA
2. Generator's name, mailing address, telephone number ☒ Yes ☐ No ☐ NA
3. Generator EPA I.D. No. ☒ Yes ☐ No ☐ NA
4. Transporter Name(s) and EPA I.D. No.(s) ☒ Yes ☐ No ☐ NA
5. a. Facility name, address, and EPA I.D. No. ☒ Yes ☐ No ☐ NA
- b. Alternate facility name, address, and EPA I.D. No. ☒ Yes ☐ No ☐ NA
- c. Instructions to return to generator if undeliverable ☒ Yes ☐ No ☐ NA
6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number) ☒ Yes ☐ No ☐ NA
7. Emergency information (optional) (special handling instructions, telephone No.) ☒ Yes ☐ No ☐ NA
8. Is the following certification on each manifest form? ☒ Yes ☐ No ☐ NA

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? ☒ Yes ☐ No ☐ NA

If yes, complete a through e.

- a. 1. Did generator sign and date all manifests? ☒ Yes ☐ No ☐ NA
2. Who signed for generator? ☒ Yes ☐ No ☐ NA

Name Anthony Helms Title Assist Manger

- b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? ☒ Yes ☐ No ☐ NA
2. Who signed and dated for transporter? ☒ Yes ☐ No ☐ NA

Name Various Title ?

- c. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ☐ No ☐ NA
d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ☐ No ☐ NA
e. Does generator retain copies for 3 years? ☒ Yes ☐ No ☐ NA

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? (261.30) ☒ Yes ☐ No ☐ NA

a. If yes, list waste and quantities (include EPA Hazardous Waste No.) F034

2. Does generator solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20) ☐ Yes ☒ No ☐ NA

a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) _____

- b. Does generator determine characteristics by testing or by applying knowledge of processes? _____

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☐ Yes ☐ No ☒ NA

a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators?

☒ Yes ___ No ___ NA

- a. If yes, did generator test all wastes to determine nonhazardous characteristics?

☒ Yes ___ No ___ NA

1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30)

☒ Yes ___ No ___ NA

2. a. Are containers to be shipped leaking or corroding?

___ Yes ___ No ☒ NA

- b. Use sheet to describe containers and condition.

- c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31)

___ Yes ___ No ___ NA

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172?

☒ Yes ___ No ___ NA

4. Does generator mark each package in accordance with 49 CFR 172?

☒ Yes ___ No ___ NA

5. Is each container of 110 gallons or less marked with the following label? (262.32)

☒ Yes ___ No ___ NA

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

Manifest document No. _____

6. Does generator have placards to offer to transporters? (262.33)

☒ Yes ___ No ___ NA

7. Accumulation time: (262.34)

- a. Are containers used to temporarily store waste before transport? ☒ Yes ☐ No ☐ NA
1. If yes, is each container clearly dated:
Also, fill out rest of No. 7 (accum. time) ☒ Yes ☐ No ☐ NA
- b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ☒ Yes ☐ No ☐ NA
2. If yes, with what frequency? *weekly* ☒ Yes ☐ No ☐ NA
- c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) ☐ Yes ☐ No ☒ NA

NOTE: If tanks are used, fill out checklist for tanks.

- d. Are the containers labeled and marked in accordance with Section D-3, D-4, and D-5 of this form? ☐ Yes ☐ No ☐ NA

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

- e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) ☒ Yes ☐ No ☐ NA
8. Describe storage area. Use photos and narrative explanation sheet.

Section E - Recordkeeping and Records (262.40)

1. Does generator keep the following reports for 3 years?

- a. Manifests and signed copies from ☒ Yes ☐ No ☐ NA
- b. Biennial Reports ☒ Yes ☐ No ☐ NA
- c. Exception reports ☐ Yes ☐ No ☒ NA
- d. Test results ☒ Yes ☐ No ☐ NA

2. Where are the records kept (at facility or elsewhere)?

Main office at facility

3. Who is in charge of keeping the records?

Name *Anthony Helms* Title *Asst Plant Mgr*

Section F - Special Conditions

1. Has generator received from or transported to a foreign Administrator? ☐ Yes ☒ No ☐ NA
- a. If yes, has he filed a notice with the Regional Administrator? ☐ Yes ☐ No ☒ NA
- b. Is this waste manifested and signed by a foreign cosignee? ☐ Yes ☐ No ☒ NA
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? ☐ Yes ☐ No ☒ NA

Appendix I - Satellite Accumulation Area

1. Source/Area: _____

2. Type waste: _____

3. Condition of Containers: _____

a. Containers closed?

___Yes ___No ___NA

b. Containers properly labeled?

___Yes ___No ___NA

4. If > 55 gallons accumulated, has generator complied with 262.34(c)(2)?

___Yes ___No ___NA

Appendix II - Less-than-Ninety Day Storage

1. Source/Data: _____

2. Type(s) of waste: _____

3. Condition of containers: _____

- a. Containers closed?
- b. Containers properly labelled?
- c. Accumulation dates?
- d. Area inspected?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA

Waste Information Worksheet
(To be filled out for each hazardous waste)

Waste Name: _____
Waste Code: _____

Process Generating Waste: _____

How was determination made?
____ Knowledge of Waste. Describe. _____
____ Testing. Describe. _____

Waste Generation Rate (may be estimated) _____

Disposal Procedure: _____

Site/Firm: _____

Is waste subject to requirements of MHWMR 268? Yes__ No__
Describe. _____

Is waste excluded under MHWMR 261.4? Yes__ No__
Describe. _____

Part ____

SURFACE IMPOUNDMENTS CHECKLIST

Section A - Design Requirements (264.221) (265.221)

1. Does facility operate one or more surface impoundments? Yes ☒ No NA

a. If yes, has owner/operator installed two or more liners and a leachate collection system for any new units, replacement of any existing units, or lateral expansion of units? Yes No NA

b. Is owner/operator exempt from double-liner leachate collection system requirements because Regional Administrator has determined that impoundment's design will prevent the migration of hazardous constituents? Yes No NA

c. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)? Yes No NA

d. If impoundment does not have a double liner, is it exempt due to one of the following reasons? Yes No NA

1. Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand.
2. Monofill has at least one liner for which there is no evidence of leaking.
3. Monofill is located, designed, and operated to ensure that no migration of constituents into ground or surface water occurs.

e. Does owner/operator take measures to prevent overfilling; wind and wave action; rainfall; run-on; malfunctions of level controllers, alarms, and other equipment; and human error (Part 264)? Yes No NA

f. Is impoundment surrounded by dikes (Part 264)? Yes No NA

Section B - Operating Requirements

1. Does owner/operator maintain at least 60 cm (2 ft) of freeboard (Part 265)? (265.222)

2. Does owner/operator have certification from a qualified engineer that alternate design features will prevent overtopping? (Part 265) (265.222) Yes No NA

Section C - Containment Systems

1. Do all dikes have a protective cover such as grass, shale or rock? (Part 265) (265.223) __Yes __No __NA

Section D - Waste Analysis and Trial Tests

1. Will the surface impoundment be used to: (265.225)
- a. Chemically treat a hazardous waste which is substantially different from wastes previously treated in the impoundment? (Part 265) __Yes __No __NA
 - b. Chemically treat hazardous waste with a substantially different process than any previously used in that impoundment? __Yes __No __NA
2. If the answer in #1 was yes to any questions, has the owner/operator:
- a. Conducted waste analysis or trial treatment tests? __Yes __No __NA
 - b. Obtained written, documented information on treatment of similar wastes under similar operating conditions? __Yes __No __NA

Section E - Inspections and Monitoring

1. Does the owner/operator:
- a. Inspect the freeboard at least one each operating day? (265.226) __Yes __No __NA
 - b. Inspect the surface impoundment including dikes and vegetation at least once per week and after storms? (264.226) (265.226) __Yes __No __NA
2. Have any deteriorations or malfunctions that have been found been remediated? __Yes __No __NA
3. Has the owner/operator obtained a certification from a qualified engineer that the impoundments dike has structural integrity? (264.226) __Yes __No __NA

Section F - Emergency Repairs, Contingency Plans (Part 264) (264.227)

1. Does facility have a contingency plan? __Yes __No __NA
- a. If yes, does plan stipulate that impoundment be removed from service under the following conditions:
 - 1. Sudden drop in liquid level? __Yes __No __NA

2. Leaking dike? ☐ Yes ☐ No ☒ NA
- b. Does plan detail the steps to be followed when removing impoundment from service, including:
1. Shutting off flow into impoundment? ☐ Yes ☐ No ☒ NA
 2. Containing any surface leakage? ☐ Yes ☐ No ☒ NA
 3. Stopping the leak? ☐ Yes ☐ No ☒ NA
 4. Notifying Regional Administrator of problems in writing if leaks cannot be contained? ☐ Yes ☐ No ☒ NA
- c. If impoundment was removed from service, did owner/operator take the necessary precautions to rectify problems before restoring impoundment to service? ☐ Yes ☐ No ☒ NA
- d. If impoundment was removed from service and was not restored to service, was impoundment closed in accordance with an approved closure plan? ☐ Yes ☐ No ☒ NA

Section G - Closure and Post-Closure (264.228) (265.228)

1. Is a closure plan retained at the facility? ☐ Yes ☐ No ☒ NA
2. At closure, did owner/operator:
- a. Remove standing liquids (Part 265)? ☐ Yes ☐ No ☒ NA
 - b. Remove waste and waste residue (Part 265)? ☐ Yes ☐ No ☒ NA
 - c. Remove liner (Part 265)? ☐ Yes ☐ No ☒ NA
 - d. Remove underlying and surrounding contaminated soil? ☐ Yes ☐ No ☒ NA
 - e. If not, did owner/operator demonstrate to Regional Administrator that the above materials were non-hazardous (Part 265)? ☐ Yes ☐ No ☒ NA
 1. If no, has owner/operator closed the impoundment and provided post-closure care (Part 265)? ☐ Yes ☐ No ☒ NA
3. If regulated under Part 264, has owner/operator: (264.228)
- a. Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment, and managed them as hazardous waste? ☐ Yes ☐ No ☒ NA
 - b. Eliminated free liquids by removing or solidifying remaining wastes or waste residues? ☐ Yes ☐ No ☒ NA
 - c. Stabilized remaining wastes to a bearing capacity sufficient to support final cover? ☐ Yes ☐ No ☒ NA
 - d. Covered the impoundment with final cover? ☐ Yes ☐ No ☒ NA
4. Did owner/operator leave any residuals in place at closure (Part 264)? (264.228) ☒ Yes ☐ No ☐ NA

5. In post-closure, does owner/operator maintain integrity of cover and groundwater monitoring system, and prevent runoff and runoff? (264.228) (265.228)

☒ Yes ☐ No ☐ NA

Section H - Ignitable and Reactive Wastes (264.229) (265.229)

1. Are ignitable or reactive wastes placed in the impoundment?

☐ Yes ☐ No ☐ NA

- a. If yes, are they treated, rendered, or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive?

☐ Yes ☐ No ☐ NA

OR

- b. Is the impoundment used solely for emergencies?

☐ Yes ☐ No ☐ NA

Section I - Incompatible Wastes

(264.230) (265.230)

1. Are incompatible wastes placed in the impoundment?

☐ Yes ☐ No ☒ NA

Part ____

GROUNDWATER MONITORING CHECKLIST

Section A - Monitoring System

1. Does the facility have a groundwater monitoring system in operation? ☒ Yes ___ No ___ NA
- a. If yes, does the system consist of: (265.91)(264.97)
1. At least one upgradient/background well? ☒ Yes ___ No ___ NA
2. At least three downgradient wells? ☒ Yes ___ No ___ NA
- b. Are wells identified in the field? ☒ Yes ___ No ___ NA
- c. Are well heads in good condition (i.e. free of cracks)? ☒ Yes ___ No ___ NA
- d. Are well heads locked? ☒ Yes ___ No ___ NA
- e. Do well heads have bumper guards or are otherwise protected? ☒ Yes ___ No ___ NA

Section B - Sampling and Analysis (Part 264)

1. Does the facility obtain and analyze samples from the groundwater monitoring system? ☒ Yes ___ No ___ NA
2. Has facility developed and followed a groundwater sampling and analysis plan? (264.97(d)) ☒ Yes ___ No ___ NA
- a. If yes, does this plan include procedures and techniques for:
1. Sample collection? ☒ Yes ___ No ___ NA
2. Sample preservation? ☒ Yes ___ No ___ NA
3. Analytical procedures? ☒ Yes ___ No ___ NA
4. Chain-of-custody control? ☒ Yes ___ No ___ NA
5. Determining the groundwater surface elevation? ☒ Yes ___ No ___ NA
3. Has facility specified a statistical method to be used in evaluating groundwater monitoring data? ___ Yes ___ No ☒ NA
4. Is all groundwater monitoring data recorded in the operating record? ☒ Yes ___ No ___ NA

Section C - Detection Monitoring Program (264.98)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases?

___ Yes ___ No ☒ NA

- a. If yes, are the following components included in the system:

1. Background values?
2. Determination of groundwater flow rate and direction annually? (264.98(e))
3. Determination of statistically significant increases over background concentrations at each well? (264.98(f))
4. If there was a statistically significant increase indicated, did the facility notify the Executive Director per 264.98(g)(1)?
5. Did facility attempt to demonstrate an apparent increase was not caused by a regulated unit per MHWMR 264.98(g)(6)?
6. Is all information contained in the facility's operating record?

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

Section D - Compliance Monitoring Program (264.99)

1. Does the facility operate a compliance monitoring program?

☒ Yes ___ No ☒ NA

- a. If yes, does the facility:

1. Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e))
2. Collect at least four samples from each well at least semi-annually? (264.99(f))
3. Determine whether there is statistically significant evidence of increased contamination at each monitoring well?
4. If an increase was indicated, did facility notify the Executive Director?
5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually?
6. Record all information in the operating record?

☒ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

___ Yes ___ No ☒ NA

Section E - Corrective Action Program (Part 264 only) (264.100)

1. Does facility follow a corrective action program that meets the facility's permit requirements?

☒ Yes ___ No ___ NA

The facility is in the process of expanding the corrective action

Section F - Sampling and Analysis (Part 265)

1. Has the facility developed and followed a groundwater sampling and analysis plan? ☐ Yes ☐ No ☒ NA
- a. If yes, does the plan include procedures and techniques for:
- 1. Sample collection? ☐ Yes ☐ No ☒ NA
 - 2. Sample preservation? ☐ Yes ☐ No ☒ NA
 - 3. Analytical procedure? ☐ Yes ☐ No ☒ NA
 - 4. Chain-of-custody control? ☐ Yes ☐ No ☒ NA
2. Has the owner/operator established initial background concentrations or values of all parameters specified in 265.92(b)? ☐ Yes ☐ No ☒ NA
- a. Samples collected to establish background quality (from above)? ☐ Yes ☐ No ☒ NA
- b. Samples collected to indicate contamination (from above)? ☐ Yes ☐ No ☒ NA
- c. Elevation of groundwater surface at each monitoring well at each sampling event? ☐ Yes ☐ No ☒ NA

Section G - Preparation, Evaluation, and Response (Part 265 only) (265.93)

1. Did owner/operator prepare an outline of a groundwater quality assessment program? ☐ Yes ☐ No ☒ NA
- a. If yes, did program determine the following:
- 1. Whether hazardous waste or hazardous waste constituents have entered the groundwater? ☐ Yes ☐ No ☒ NA
 - 2. Rate and extent of hazardous waste or hazardous waste constituent migration? ☐ Yes ☐ No ☒ NA
 - 3. Concentrations of hazardous waste or hazardous waste constituents in groundwater? ☐ Yes ☐ No ☒ NA
- b. For each well, has owner/operator calculated the arithmetic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean? ☐ Yes ☐ No ☒ NA
- c. Has owner/operator submitted information documenting any significant increase in comparisons for up-gradient wells (or decrease in pH)? ☐ Yes ☐ No ☒ NA
- d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional groundwater samples from

those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error)

___ Yes ___ No ___ NA

1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days? ___ Yes ___ No ___ NA
2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Executive Director within 15 days after notification (discussed above) a certified groundwater quality assessment program? ___ Yes ___ No ___ NA
3. Did owner/operator implement the groundwater quality assessment program and, at a minimum, did he determine the following: ___ Yes ___ No ___ NA
 - a. Rate and extent of migration of the hazardous waste constituents in the groundwater? ___ Yes ___ No ___ NA
 - b. Concentrations of the hazardous waste in the groundwater? ___ Yes ___ No ___ NA
4. Did owner/operator submit a report to the Executive Director containing the requests of the assessment outlined in No. 3 above within 15 days? ___ Yes ___ No ___ NA
5. Did owner/operator notify the Executive Director of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the groundwater? ___ Yes ___ No ___ NA
6. If owner/operator determined that hazardous waste or hazardous waste constituents entered the groundwater, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or groundwater quality assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if groundwater quality assessment plan was implemented during post-closure? ___ Yes ___ No ___ NA
7. If any groundwater quality assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed program and reported to the Executive Director, as outlined in No. 4 above? ___ Yes ___ No ___ NA
8. If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on groundwater elevation

obtained under No. 3c in Section F above
to determine whether the requirements for
locating monitoring wells are satisfied?

☐ Yes ☐ No ☐ NA

- a. If evaluation shows that the requirements
for monitoring wells are not satisfied,
has owner/operator modified the number,
location, or depth of the monitoring wells
to bring the system into compliance?

☐ Yes ☐ No ☐ NA

Section H - Recordkeeping and Reporting (Part 265 only) (265.94)

1. Unless owner/operator is monitoring to satisfy the
requirements of Section 265.93(d)(4), does owner/
operator:

- a. Keep records of the analyses required in Section
265.92(c) and (d), groundwater surface elevations
required in 265.93(b) throughout the active life
of the facility and throughout post-closure?

☐ Yes ☐ No ☐ NA

- b. Report the following information to the Executive
Director:

1. Within 15 days of analysis for each quarterly
sampling event, does owner/operator submit
results of background concentrations?

☐ Yes ☐ No ☐ NA

2. Does owner/operator inform the Executive
Director about any parameters that exceed
maximum contaminant levels listed in Appendix
III?

☐ Yes ☐ No ☐ NA

3. (Annually) does owner/operator report
concentrations or values of parameters listed
in Section 265.92(b)(3) for each well, including
required evaluation for these parameters under
Section 265.93(b)?

☐ Yes ☐ No ☐ NA

- a. Does owner/operator also identify
differences from initial background
concentrations found in the upgradient
wells no later than March 1 following
each calendar year?

☐ Yes ☐ No ☐ NA

2. Does owner/operator submit results of the groundwater
surface elevations under Section 265.93(f), along with
a description of the response, if needed?

☐ Yes ☐ No ☐ NA

3. If groundwater is monitored to satisfy requirements of Section 265.93(d)(4), did owner/operator do the following:

a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure?

☐ Yes ☐ No ☒ NA

b. (Annually, until final closure) submit to the Regional Administrator a report containing the results of the groundwater quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1?

☐ Yes ☐ No ☒ NA

Part ____

FINANCIAL REQUIREMENTS CHECKLIST

Section A - Closure

1. Is facility required to provide financial assurance for closure? Yes ☒ No ☐ NA ☐
- a. Type of financial assurance _____
- b. Amount of closure costs _____
1. Date of most recent adjustment _____
- c. Effective date of mechanism _____
- d. Expiration date of mechanism _____
- e. Is instrument adequate? Yes ☐ No ☐ NA ☐

Section B - Post-Closure

1. Is facility required to provide financial assurance for post-closure care? ☒ Yes ☐ No ☐ NA ☐
- a. Type of financial assurance Financial Test
- b. Amount of closure costs \$ 429,900
1. Date of most recent adjustment _____
- c. Effective date of mechanism April 1, 1992
- d. Expiration date of mechanism April 1, 1993
- e. Is instrument adequate? ☒ Yes ☐ No ☐ NA ☐

Section C - Corrective Action

1. Is facility required to provide financial assurance for corrective action? ☒ Yes ☐ No ☐ NA ☐
- a. Type of financial assurance Financial Test
- b. Amount of closure costs \$ 121,000
1. Date of most recent adjustment _____
- c. Effective date of mechanism April 1, 1992
- d. Expiration date of mechanism April 1, 1993
- e. Is instrument adequate? ☒ Yes ☐ No ☐ NA ☐

Section D - Liability Requirements

1. Is facility required to provide liability coverage for sudden accidental occurrences? ☒ Yes ☐ No ☐ NA ☐
- a. Type of assurance Financial Test
- b. Is amount at least \$1 million per occurrence, \$2 million annual aggregate? ☒ Yes ☐ No ☐ NA ☐
- c. Effective date of mechanism April 1, 1992

Tronox LLC, Columbus

General Information

ID	Branch	SIC	County	Basin	Start	End
1696	Chemical	2491	Lowndes	Tombigbee River	10/27/1992	

Address

Physical Address (Primary)	Mailing Address
2300 14th Avenue North Columbus, MS 39701	PO Box 268859 Oklahoma City, OK 731268859

Telecommunications

Type	Address or Phone
Work phone number	(405) 775-5129

Alternate / Historic AI Identifiers

Alt ID	Alt Name	Alt Type	Start Date	End Date
2808700020	Tronox LLC, Columbus	Air-AIRS AFS	10/12/2000	06/01/2002
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Construction	06/12/1998	
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/06/1997	06/01/2002
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/12/1998	06/01/2002
MSR220010	Kerr McGee Chemical Corporation, Columbus	GP-Wood Treating	10/27/1992	07/13/1997
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-EPA ID	10/12/2000	
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-TSD	06/11/2001	04/12/2006
MSD990866329	Tronox LLC, Columbus	Hazardous Waste-TSD	04/13/2006	05/31/2011
1696	Kerr McGee Chemical Corporation	Historic Site Name	10/27/1992	04/10/2006
1696	Tronox, LLC	Official Site Name	04/10/2006	
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/11/1994	10/10/1999
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	08/23/2000	07/31/2005
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/31/2005	04/12/2006
MSP090021	Tronox LLC, Columbus	Water-Pretreatment	04/13/2006	09/30/2010

Regulatory Programs

Program	SubProgram	Start Date	End Date
Air	NSPS Subpart Dc	09/12/1990	06/01/2002
Air	SM	06/06/1997	06/01/2002
Hazardous Waste	Large Quantity Generator	04/01/1997	
Hazardous Waste	TSD - Not Classified	06/11/2001	
Water	PT CIU	10/11/1994	09/01/2003
Water	PT CIU - Timber Products	10/11/1994	09/01/2003

	Processing (Subpart 429)		
Water	PT NCS	09/01/2003	
Water	PT SIU	10/11/1994	

Locational Data

Latitude	Longitude	Metadata	S / T / R	Map Links
33 ° 30 ' 38 .51 (033.510697)	88 ° 24 ' 34 .02 (088.409450)	Point Desc: PG - Plant entrance (General) Data collected by Louis Crawford on 7/11/00. PG - Plant Entrance (General) Data collected by Clift Jeter on 6/13/02. LAT 33deg 30min 36.6sec LON 88deg 24min 35.1sec Method: GPS Code (Psuedo Range) Differential Datum: NAD83 Type: MDEQ	Section: Township: Range:	SWIMS TerraServer Map It

10/13/2006 10:29:50 AM

Kerr McGee Chemical Corporation, Columbus

General Information

ID	Branch	SIC	County	Basin	Start	End
1696	Chemical	2491	Lowndes	Tombigbee River	10/27/1992	

Address

Physical Address (Primary)	Mailing Address
2300 14th Avenue North Columbus, MS 39701	PO Box 268859 Oklahoma City, OK 731268859

Telecommunications

Type	Address or Phone
Work phone number	(405) 775-5110

Alternate / Historic AI Identifiers

Alt ID	Alt Name	Alt Type	Start Date	End Date
08700020	Kerr McGee Chemical Corporation, Columbus	Air-AIRS AFS	10/12/2000	
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Construction	06/12/1998	
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/06/1997	06/01/2002
168000020	Kerr McGee Chemical Corporation, Columbus	Air-Synthetic Minor Operating	06/12/1998	06/01/2002
MSR220010	Kerr McGee Chemical Corporation, Columbus	GP-Wood Treating	10/27/1992	07/13/1997
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-EPA ID	10/12/2000	
MSD990866329	Kerr McGee Chemical Corporation, Columbus	Hazardous Waste-TSD	06/11/2001	05/31/2011
1696	Kerr McGee Chemical Corporation	Official Site Name	10/27/1992	
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/11/1994	10/10/1999
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	08/23/2000	07/31/2005
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/31/2005	09/30/2010

Regulatory Programs

Program	SubProgram	Start Date	End Date

Air	NSPS Subpart Dc	09/12/1990	
Air	SM	06/06/1997	
Hazardous Waste	TSD - Not Classified	06/11/2001	
Water	PT CIU	10/11/1994	09/01/2003
Water	PT CIU - Timber Products Processing (Subpart 429)	10/11/1994	09/01/2003
Water	PT NCS	09/01/2003	
Water	PT SIU	10/11/1994	

Locational Data

Latitude	Longitude	Metadata	S / T / R	Map Links
33 ° 30 ' 38 .51 (033.510697)	88 ° 24 ' 34 .2 (088.409450)	Point Desc: PG - Plant entrance (General) Data collected by Louis Crawford on 7/11/00. PG - Plant Entrance (General) Data collected by Clift Jeter on 6/13/02. LAT 33deg 30min 36.6sec LON 88deg 24min 35.1sec Method: GPS Code (Psuedo Range) Differential Datum: NAD83 Type: MDEQ	Section: Township: Range:	SWIMS TerraServer Map It

Report Date: 12/15/2005 9:06:32 AM

COMPLIANCE EVALUATION INSPECTION
KERR-McGEE CHEMICAL CORP.
COLUMBUS, MISSISSIPPI
JUNE 30, 1992