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

COLUMIBUS, 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. <u>Inspection Participants</u>

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

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 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 bottom sediment sludge from process The surface impoundments were replaced by accumulated. upgrading production process oil/water separators to recycle preservatives for re-application within the production The wastewater is then pumped to the wastewater process. 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). 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 the spent should be managed as hazardous waste. solvent exhibit a hazardous characteristic other than ignitability and the resulting mixture does not exhibit characteristic (not only the characteristic exhibited by the solvent, but any characteristic) 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 wills 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. <u>Signatures</u>

Inspector Date

Dame K. (2000)

Supervisor

7/25/94

Date

Part 1

General Site Information

Facility Name:	KERR- Me	GEE CHEMICA	Coasaa	دمد،	VIX
Address:	P.6. 30	986	CERPORAL	100	
	Commerce	MS 39701			
I.D. Number: Contact:	WCD 9908	366325			
Title:	10m He	ims			
Phone Number:	PLANT N	MADAGER			
Type of Ownershi	ip:				
Federal	State	County	Municipa	l KPriva	te
Facility Status:					
Generator	Transp	orterTre	eatment	_Storage 久	Disposal
Regulatory Statu		•		п	(loseb
Interim Stat	110		>		
Permitted			Submitted in Preparat	ion	
Principal Inspector Organization:	tor Name:	Beace Feech	<u>గుల</u> Ti one Number:	tle: <u>ERII</u> (601) 9(61)	- 51¥ [
Inspection Partic				· ·	K
Name Name		Title	Re	presenting	*
Bruce FERLIXO	ســــــــــــــــــــــــــــــــــــــ		1	260	
CHARLES Swar				KMCC	W.
Tem HELMS				KMCL	
33				Vit	
			•		
	(9)			17	

Z.

GENERAL FACILITY CHECKLIST

	GENERAL PACIFITY CHECKLIST
Section 1	A - General Facility Standards
	Mar w Dark
1. Does	facility have EPA Identification No.? XYes No NA
a.	If yes, EPA I.D. No. MSD 99 08 66329
er sef	If no, explain.
7. Hag f	facility received hazardous waste from a foreign
source	ee?Yes XNo NA
a.	If yes, has it filed a notice with the Regional
×	Administrator? Yes No XNA
Wassa Ass	Anna and An
Waste Ana	ilysis
3. Does	facility maintain a copy of the waste analysis
plan	at the facility? XYes No NA
4.	If yes, does it include: (264.13) (265.13)
	1. Parameters for which each waste will be
	analyzed? Xyes No NA
	2. Test methods used to test for these makes the second se
****	parameters? (DATED .s. EP TEA)
	3. Sampling method used to obtain sample? XYes No NA
	4. Frequency with which the initial analyses
	will be reviewed or repeated?YesNoNA 5. (For offsite facilities) waste analyses that
100 200	generators have agreed to supply?YesNoXNA 6. (For offsite facilities) procedures which are
	used to inspect and analyze each movement of
6	hazardous waste, including:
	a. Procedures to be used to determine the
	identity of each movement of waste. YesNo XNA
	b. Sampling method to be used to obtain
	representative sample of the waste to be
	identifiedYesNo _XNA
4. Does t	the facility provide adequate security through: (264.14) (265.14)
a. 2	4-hour surveillance system (e.g., television
π	conitoring or guards)?Yes XNoNA

OR

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

How long are they kept? IMDEFINITE			
a. If yes, do they include:	prei A		
X X			
2. Job citie and written job description of each			
position?	<u> X</u> Yes		
Description of type and amount of training?Records of training given to facility	<u> </u>		
personnel?	<u>K</u> Yes	No	NA
Requirements for Ignitable, Reactive, or Incompatible Waste	e and a		
(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 procedure	EMU TO		
2. If no, use narrative explanation sheet to	3.		[6]
describe sources of ignition or reaction.			
b. Are smoking and open flames confined to specifical	•		
designated locations?	тÀ		Y
A THE TAXABLE TO THE RESIDENCE OF THE STATE	Yes	No _	Z _N A
c. Are "No Smoking" signs posted in hazardous areas?	Yes	_No	(NA
d. Are precautions documented (Part 264 only)?	Yes	No_ <u>}</u>	NA
9. Check containers		1.	
THE RESERVE OF THE PROPERTY OF			
a. Are containers leaking or corroding?	Yes	_мо {	_NA
h Is there evidence of beet consulting			
b. Is there evidence of heat generation from incompatible wastes?	Yes .	_No X	_NA
Section R - Bronaudness and Passes	94	e in	
Section B - Preparedness and Prevention			
1. Is there evidence of fire, explosion, or contamination			
of the environment? (264.31) (265.31)		V	
(204.31) (203.31)	_Yes _	Дио _	_NA
If yes, use narrative explanation sheet to explain.			

<u>Se</u>	ction C - Contingency Plan and Emergency Procedures	24
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
	a. II yes, is it a revised SPCC Plan?	Ties Tho Thy
	b. Does contingency plan include: (264.52) (265.52)	
	1. Arrangements with local emergency response organizations?	/v v- v-
	2. Emergency coordinator's names, phone numbers	Yes _No _NA
	y and addresses?	Yes No NA
	3. List of all emergency equipment at facility and descriptions of equipment?	V v v v
	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)	YesNoNA
Se	ction D - Manifest System, Recordkeeping, and Reporting	
	The state of the s	
1.	Does facility receive waste from offsite? (264.71) (265.71)	Yes Xnona
	a. If yes, does the owner/operator retain copies of	
	all manifests?	YesNo _XNA
	Are the perifects aired and details and	
	 Are the manifests signed and dated and returned to the generator? 	Yes No XNA
	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 XNo _NA
	a. If yes, is it accompanied by a shipping paper?	YesNo XNA
	1. Does the owner/operator sign and date the	
	shipping paper and return a copy to the	
	generator?	_Yes _No XNA
	2. Is a signed copy given to the transporter?	Yes No XNA
3.	Has the owner/operator received any shipments of waste	
	that were inconsistent with the manifest (manifest	1.
	discrepancies)? (264.72) (265.72)	_Yes _No XNA
	a. If yes, has he attempted to reconcile the	- 1 "
	discrepancy with the generator and transporter?	_Yes _No _NA
	1. If no, has Regional Administrator been	الله المالية
•	notified?	Yes No KNA

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

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100.100.00	1911174510	711141-4	215	171776

GENERATOR'S CHECKLIST

Section	on A - EPA-Identification No. 1 super of Edata force and the	
	of the end one operations to	
1. Do	pes generator have EPA I.D. No.? (262.12)	Xes No
	THE PARTY OF THE P	Tres _No
	. If yes, EPA I.D. No. 990866329	•
		2 E BUT . 387 21
Section	on B - Manifestagrament lie auch one ages coestroom o.	
	Available of the state of the s	
1. Do	es generator ship waste offsite? (262.20)	Yes _No .
a a	. If no, do not fill out Sections B and D.	·
c isa b	. If yes, identify primary offiste facility(s).	
5 55	Chem waste	
100 <u>000</u>	+ /	M
2. Do	es generator use manifest? (262.20)	$\frac{\cancel{N}}{\cancel{N}}$ Yes \underline{N} o
a	. If no, is generator a small quantity generator	
	(generating between 100 and 1000 kg/month)?	YesNo _
	1. If yes, does generator indicate this when	guden.
	sending waste to a TSD facility?	YesNo 2
b	. If yes, does manifest include the following	
	information?	YesNo _
	1. Manifest document No.	Yes No
* -1	2. Generator's name, mailing address, telephone	X
	number	Yes No
	3. Generator EPA I.D. No.	Yes No
	4. Transporter Name(s) and EPR I.D. No.(s)	Yes No
	5. a. Facility name, address, and EPA I.D. No.	XYes No
	b. Alternate facility name, address, and EPA	
	I.D. No. Appendix of the magnetic at the	Yes No
	c. Instructions to return to generator if	~
	undeliverable	Yes _No _
4	6. Waste information required by DOE - shipping	
	7 Pamo manasas (asalata	1/
	(type and number)	Yes No
	7. Emergency information (optional) (special	
	handling instructions, telephone No.)	
Elm it	8. Is the following certification on each	
	manifest form?	Yes No

	a. If equivalent test methods used, attach			
	copy of equivalent methods used.			12
3.	Are there any other solid wastes generated by	· 1	Ra	
	generators? Thereby the sale resistance mose su long II	XYes		N
	see the contract of the read one field calls	t^{-}	44.5	
	a. If yes, did generator test all wastes to determine			
	nonhazardous characteristics?	Xyes	No.	N.
. *	or corrocatio. (Healine inspectates 1		_	
	1. If no, list wastes and quantities deemed			
	nonhazardous or processes from which non-			
	hazardous waste was produced (use additional			
_	sheet if necessary).			
$\frac{2}{3}$	ELLO ENDS FROM TREATED TIES WERE TESTED FO	X		
	LY. THIS WASTE IT AS BEEN DETERMINED BY GOT	<u> 4</u>		
71	7 10 HART TSK FORA.			
			F17.5	
Sec	tion D - Pretransport Requirements	4		
!	1971 - Territ rant 15 PAR - TA L-H 1-H 1822/189			
1.	Does generator package waste in accordance with 49 CFR	y	x)	
	173, 178, and 179 (DOT requirements)? (262.30)		No	N
2.	a. Are containers to be shipped leaking or corroding?	Yes	XN-	271
	b. Use sheet to describe containers and condition.	168	-140	N
	c. Is there evidence of heat generation from			238
	incompatible wastes in the containers? (262.31)	Yes	χ_{No}	N
2	Dong goroupen follow non-tally			2.4
٠.	Does generator follow DOT labeling requirements in accordance with 49 CFR 1722 Hands and the second	Yes		
	accordance with 193 property 1/27 Hands The Land	TAss	No	NA
4.	Does generator mark each package in accordance with			
••	49 CFR 172?	Yes	÷	
		√xes	NO	NA
5.	Is each container of 110 gallons or less marked with			\$
	the following label? (262.32)	Vec	No	XNA
	A	1100	—"	
	Label saying: HAZARDOUS WASTE - Federal Law Prohibits	مريق - سام		
	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)	4		
		_ ====		
	Manifest design to the second	-	= 1	
	Manifest document No.	_	- 14	
	Does generator have placards to offer to transporters?		1111	
	(262.33)	Was	NO	NA

Section F - Special Conditions

1.	Has Admi	generator received from or transported to a foreign nistrator?	Yes	No	NA
	a.	If yes, has he filed a notice with the Regional Administrator?	Yes	No	PNA
	b.	Is this waste manifested and signed by a foreign cosignee?			XNA
	c.	If generator transported wastes out of the country, has he received confirmation of delivered			4
		shipment?	Voc	Ma	Xxxx

Part

192

.1

CONTAINERS CHECKLIST

Section A - Use and Management	(264.171) (265.171)
1. Are containers in good condition	on? Yes No _1
19¥	TARBUE TIME
Section B - Compatibility of Waste	With Container (264.172)
1. Is container made of a material the waste which it stores?	that will not react with YesNoN
Section C - Management of Container	<u>rs</u> (264.173) (265.173)
1. Is container always closed while waste?	e holding hazardous has cover Yes _No _N
2. Is container handled so that it handled, or stored in a manner cause it to leak?	will not be opened, which may rupture it or Yes _No _N
Section D - Inspections (264.174)	(265.174)
1. Does owner/operator inspect confor leaks and deterioration?	tainers at least weekly
Section E - Containment (Part 264)	(264.175)
1. Do container storage areas have	a containment system? AresNo/_NA
a. Is the base free of cracksb. Is the base sloped or other	or gaps?
c. Does the containment system	YesNoYNA
capacity to contain 10% of	the volume of
meriod available fo	the largest container?YesNo NA prevent run-on into the
e. Is spilled or leaked materi	Yes No X NA
precipitation removed from in a timely manner?	the containment areaYesNo _XNA

		- 41	SURFACE IMPOUNDMENTS CHECKLIST		
	Sec	tion.	A - Design Requirements (264.221) (265.221)		
	1.	Does	facility operate one or more surface impoundments?	Yes XN	о _и
		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?	Y	. V
	13	b.	Is owner/operator exempt from double-liner leachate collection system requirements because Regional Administrator has determined that impoundment's	_YesNe	- 4 ⁿ
			Constituents?	_YesNo	. V.
			60 days prior to receiving waste (Part 265)?	_YesNo	
	4	ESY.		_YesNo	
	Her		1. Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand.		
		e :	 Monofill has at least one liner for which there is no evidence of leaking. Monofill is located, designed, and operated to ensure that no migration of constituents 	- 40%	
			into ground or surface water occurs.	€1	
			Does owner/operator take measures to prevent overfilling; wind and wave action; rainfall;		
		-3-	alarms, and other equipment; and human error		./
			Is impoundment surrounded by dikes (Part 264)?	YesNo YesNo	ANA NA
<u>s</u>	ecti	on B	- Operating Requirements		'
1	. D	oes c	owner/operator maintain at least 60 cm (2 ft) of part (Part 265)? (265.222)		

Does owner/operator have certification from a qualified engineer that alternate design features will prevent

_Yes _No \(\frac{\lambda}{\text{NA}}\)

overtopping? (Part 265) (265.222)

					11
		2. Leaking dike?	Yes	No	NA.
		vir i unitavat o primar a cultura la como como como la como terresista e distresi. Per	- 1000000		
	D.	Does plan detail the steps to be followed when remimpoundment from service, including:	oving		
		1. Shutting off flow into impoundment?	Yes	No	1 NA
		2. Containing any surface leakage?	Yes	_	_
		3. Stopping the leak?	Yes		\rightarrow
		4. Notifying Regional Administrator of problems			***
		in writing if leaks cannot be contained?	Yes	_No	KNA
	c.	If impoundment was removed from service, did owner.	/ ¹ 3 1		÷ .**
		operator take the necessary precautions to rectify			
		problems before restoring impoundment to service?		No	VNA
				_	+
	d.	If impoundment was removed from service and was no	E	12.00	
		restored to service, was impoundment closed in			4
		accordance with an approved closure plan?	Yes	No	NA
		1762.3861 0041.811 Backs Alvertham			
1	Section	G - Closure and Post-Closure (264.228) (265.228)		1	
	1. Is a	closure plan retained at the facility?	Yes	_No	NA
	2. At c	losure, did owner/operator:	ı		
		¥			
	a.	Remove standing liquids (Part 265)?	 <i>X</i> Yes	No	NA
	b.	Remove waste and waste residue (Part 265)?	Yes		-NA
	c.	Remove liner (Part 265)?	Yes	_	√NA
	d.	Remove underlying and surrounding contaminated			4
		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	int,		
		1. If no, has owner/operator closed the impoundme and provided post-closure care (Part 265)?	Yes	No	NA
	3 If r	egulated under Part 264, has owner/operator: (264.2			
	3	Percent or document and another market			
	٠.	Removed or decontaminated waste residues, contamina	.tea		
		system components, subsoils, structures, and equipment and managed them as hazardous waste?	ent,	**-	•••
	h		Yes	— ₄₀	NA
	D •	Eliminated free liquids by removing or solidifying remaining wastes or waste residues?	./w	2.5	110
	c.	Stabilized remaining wastes to a bearing capacity	Yes		NA
	.	sufficient to support final cover?	V~	No	NA
	đ.	Covered the impoundment with final cover?	<u>X</u> Yes <u></u> XYes	—"-	NA
	ş u.	ene miloument with linal cover:	X res	— ₄₀	—NA
	4. Did	owner/operator leave any residuals in place at	`		
	clos	ure (Part 264)? (264.228)		No	NA
			→ ₹ ·		

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

Waste Name: Confirmated So. 15 + Debrie Waste Code: F03+ Dez Le	Waste Para Waste Corre
Process Generating Waste: Clean 05 Past	practices
How was determination made? Knowledge of Waste. Describe. Testing. Describe.	Sow
Waste Generation Rate (may be estimated) Varies 39. Disposal Procedure: Land Disposal	9 tons 1993
Site/Firm: Chen waste	- and a Asset of the
Is waste subject to requirements of MHWMR 268? YesNoNoNo	Desertion
Is waste excluded under MHWMR 261.4? Yes_ No.	

Appendix I - Satellite Accumulation Area 1. Source/Area: Ith Service 2. Type waste: Fo3 - 3. Condition of Containers: Good a. Containers closed? b. Containers properly labeled? 4. If > 55 gallons accumulated, has generator complied with 262.34(c)(2)? Yes No NA

Part

GROUNDWATER MONITORING CHECKLIST

	COLUMNIA LU COLLEGIA	1 - 2211
1	Section A - Monitoring System	139-23-51
	Does the facility have a groundwater monitoring system in operation?	Yes _No _N
	a. If yes, does the system consist of: (265.91)(264	
	1. At least one upgradient/background well? 2. At least three downgradient wells?	Yes No No
	b. Are wells identified in the field? Making 51	Yes _No _N
	c. Are well heads in good condition (i.e. free of cracks)?	Yes No N
	d. Are well heads locked?	XYes _No _N
	e. Do well heads have bumper guards or are otherwise protected? Some Nant & S	YesNoN
	Section B - Sampling and Analysis (Part 264)	Sect. 01
-	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:	
	 Sample collection? Sample preservation? 	Yes _No _NA
95	3. Analytical procedures? 4. Chain-of-custody control?	Yes No NA
9	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

CAST CLASSES TRANSA PROSESSORS FOR A MORE TO THE FOREST MADE.

CAMBAGE CODE TAXON, N. CAMBAT ST. CO. OF

	2.0	B71	10-1-2	7.52.73		200	2000	vor -	1000
	12 11	11 (0.7)	18.0		181	0627	10-11-11	DOE:	11.
Section F -	Sam	pling	and An	alysis	(Part	2651	V=1/5	Atte	7 57 44

			nabilitary and though and track to selone	-
	≥1.	Has t	he facility developed and followed a groundwater	
10	170.00	campl	ing and analysis plan?	92
		sambr		Tres No ANA
			. Described Stew (evods ledsipath) esaviana di	
		a.	If yes, does the plan include procedures and	
		,	techniques for: parasse marke can available	,
i.S.	Lal	上海 1	Terso madre terotolicaba	5
			1. Sample collection?	Pres _No _NA
			2. Sample preservation?	res No TNA
			3. Analytical procedure?	Ses No NA
			4. Chain-of-custody control?	Zes No JNA
620		-	the state of the s	A 10 4 11 A
1	- 150	197		
	2.	Has t	he owner/operator established initial background	•
			ntrations or values of all parameters specified in	-6
2		265.9	2(b)?	Tyes _No 4NA
430-6			Constitution of the second of	4 - 4
		a. :	Samples collected to establish background quality	
		. .	demptes collected to establish background quality	4
			(from above)? Theory whose where success	Yes _No ANA
	15-74	b.	Samples collected to indicate contamination (from	
	100	196	above)?	Tyes _No ANA
4.		`c. 1	Elevation of groundwater surface at each monitoring	,
	1.		well at each sampling event?	Yes No XNA
į		,	err at each sampring event:	Yes _No ANA
			. And the frames of the state of the Atlanta date	i i i i i i i i i i i i i i i i i i i
			te annamen ado pareformen communication in	\supset
	Sect	tion G	- Preparation, Evaluation, and Response (Part 265	only) (265,93)
		- 17 04		-,,
	1	Did or	wner/operator prepare an outline of a groundwater	
		14		1
		quatri	y assessment program?	Exes _No 1NA
				1
		a. :	If yes, did program determine the following:	
- 7		- 9 5	1. Whether hazardous waste or hazardous waste	19
			Constituents have safe of mazardous waste	1
			constituents have entered the groundwater?	Yes _No \(\(\text{NA} \)
			2. Rate and extent of hazardous waste or	, in
			hazardous waste constituent migration?	Yes No NA
			3. Concentrations of hazardous waste or hazardous	-
			waste constituents in groundwater?	
			waste constituents in dionidwarel.	Yes _No ANA
			Linguist in Agraphy for the responding the figure of the party.	
			for each well, has owner/operator calculated the	
		ē	rithmatic mean and variance, based on four replica	te
			measurements for each sample, and compared the resu	1+= - /
		148/141	with initial background mean?	Yes ZNO INA
•	a ii	•	ten initial background mean?	Tes SINO TNA
			the management of the large and the commence of the	•
		c. H	las owner/operator submitted information documenting	g
			my significant increase in comparisons for up-	-
		6	radient wells (or decrease in pH)?	YesNoNA
		5 1	And Actions III bull	TES TUO TAN
			in the state of th	
			f the comparisons for downgradient wells show a	
		s	ignificant increase (or pH decrease), has the owne	r/ = =
		٥	perator obtained additional groundwater samples fr	OM
		_	re	- u

obtained under No. 3c in Section F above to determine whether the requirements for locating monitoring wells are satisfied? randres of analyses and evglustions confil

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

unchnoting and calculated from

ACCOUNT WERE OF BENEFICOR WRITE CONSIST Section H - Recordkeeping and Reporting (Part 265 only) (265.94)

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

- Report the following information to the Executive Director:
 - 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

/Yes __No __NA (Annually) does owner/operator report concentrations or values of parameters listed in Section 265.92(b)(3) for each well, including required evaluationg for these parameters under Yes _No _NA Section 265.93(b)?

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

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?

	(Phr Month Part Description	34774	.3
	FINANCIAL REQUIREMENTS CHECKLIST		e1 .5
<u>Sec</u>	Is facility required to provide financial assurance		
	for closure?		
	b. Amount of closure costs	the state of	<u> </u>
	Date of most recent adjustment Effective date of mechanism		
	d. Expiration date of mechanism e. Is instrument adequate?		
	*	— _{Xei}	_No _
Sec	tion B - Post-Closure		
1. =	Is facility required to provide financial assurance for post-closure care?		No
	a. Type of financial assurance Financial Tes		_
	1. Date of most recent adjustment March 199 c. Effective date of mechanism March 199	4	
•	d. Expiration date of mechanism than 1995 e. Is instrument adequate?	XYes	 No1
Sec	tion C - Corrective Action		
1.	Is facility required to provide financial assurance for corrective action?	Yes	NoN
	b. Amount of elecure costs		_
	c. Effective date of mechanism	444	_
	d. Expiration date of mechanism March 1995 e. Is instrument adequate?		_
		∡Yes	NoN
Sect	ion D - Liability Requirements	1	
1.	Is facility required to provide liability coverage for sudden accidental occurrences?	11	
	coldental occurrences?	Yes	_No _N

a. Type of assurance Financia TR3+

b. Is amount at least \$1 million per occurrence, \$2
million annual aggregate?

c. Effective date of mechanism

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

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?
- 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?
 - a. Is the assessment recertified annually?
- 4. Is the drip pad constructed of non-earthen material with the exception of wood and non-structurally supported asphalt?
- 5. Is the drip pad sloped to free-drain drippage and precipitation?
- 6. Does the drip pad have a curb or berm around the perimeter?
- 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)
- 8. Is there a synthetic liner below the drip pad?
- 9. Is there a leakage detection system immediately above the liner?
- 10. Is there a leakage detection system immediately above the liner?
 - a. Is the date, time, and quantity of any leakage removal documented in the operating log?
- 11. Is the drip pad free of cracks, gaps and corrosion?
- 12. Does the operator maintain a run-on control system?

yes no

















yes no

yes no

yes no v

yes no VA

yes no pR

yes no

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 yes no

Market States



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

COLUMISUS, 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. <u>Inspection Participants</u>

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 from process bottom sediment sludge The surface impoundments were replaced by accumulated. upgrading production process oil/water separators to recycle for re-application within the production preservatives The wastewater is then pumped to the wastewater process. 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). 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 exhibit a hazardous characteristic other than ignitability and the resulting mixture does not exhibit hazardous characteristic (not only the characteristic exhibited by the solvent, but any characteristic) 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 wills 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:

- 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/qy

Dame K. Ka

Supervisor

7/25/94

Date

Part 1

General Site Information

	1 mormation
Facility Name:	P.G. BOY 900
Address:	PA 3
	P.O. Box 906
	Commerce MS 39701
I.D. Number:	
Contact:	MSD 998866329
Title:	1000 Heine
Phone Number:	PLANT MAJACER
ruone number:	
Type of Ownershi	.p:
Federal	State
	Municipal
Facility Status:	
	·
X Generator	Transport
	TransporterTreatmentStorage
Regulatory Status	Disposal
1 302002	Closeb
Interim Statu	IMPAROACA
Z Permitted	Part B Submitted
	Dare n :
Principal -	or Name: Bouce Fercision Title: ERIT Phone Number: (60) 84 500
Omna-:	or Name: Source Co.
organization: _M	S DEC. Title: ERTI
_	S DEC Phone Number: (Got) 9(61-514)
Inspection Partic:	Dants:
Name	
BRUCE FERENCE	Title Representing
Cuarier &	DEO
To my les	DEQ Kmce
Tom HELMS	
	KMCL
40	
*	

1	b. 1.	Artificial (e.g., fend	or natus	ral barr	ier arou	nd facilit	·v	
		(e.g., fend	e or fer	nce and	cliff)?			No _ N
		Describe	FENCE		EST SE FOR		24-	
	97	AND				- marchine in ,	1 200	- THE R
	2.	Means to co	ntrol en	try thro	ough ent	rances (e.	n 98	E ₁
ৃ	e e	attendant; controlled	televisi roadway	on monit	cors, lo	cked entra	nce,	nona
20		Describe	1 10	4.50	W=	Service Control	- Train	- William
		ection Requi						
		owner/operations;	becring:	tain a w	ritten s	chedule at	. · ·	
a	 Moni 	toring equip	pment?		•			10.00
D.	. Safe	ty and emerg	ency ear	ipment?			Yes _	No NA
~ .	· / SACA	TILV CAVICAG	t •				Yes _	_NoNA
a,	. Oper	ating and st	ructural	equipme	ent?		Yes _	-No -NA
e e.	TAbe	s of problem	s of edn	ipment:			—Yes _	No NA
	1.	Malfunction						
		Operator er				4	Yes _	NO NA
	3.	Discharges			9		Yes	NO NA
.2		(·	A . 30	CATTON			Yes	No NA
		owner/operato		The second secon	nspectio	n log?	Yes _	Nona
a.	If y∈	s, does it i	include:	e-5 \$1				
ž. ,	1.	Date and tim	e of ins	Dection	27 2 (629)			
	4.	Name of inst	ector?		•		—Yes —	
	٥.	notation of	Observat	iones	129	. 590		NO _NA
	4.	Date and nat action?	ure of r	epairs o		•	-	No _NA
Ž.		Identificati					_Yes _	AN ON AN ON
b.	Are to	here any mal	function		er defic	iencies		
X _c		orrected? (use narr	ative ex	planatio	n sheet.)	Yes!	io na
c.	Are re	cords kept a	a minimu	m of thr	ee years	_	YesN	
Personne.	l Train	ing (264.16	5) (265.;	16)				
recor	ds at	ner/operator the facility		12331	-4.316	A 30. 1 30. 1	X ves	
Date	of mos	t recent tra	ining:	istain .	135433	33.445	<u>. </u>	NA

Part ___

GENERAL FACILITY CHECKLIST

Section A	_	Constitution	=14 15 1	inches.	
A		General	Facility	Standards	83

Schelal Facility Standards	
1. Does facility have EPA Identification No.?	XYesNoNA
a. If yes, EPA I.D. No. MSD 990866 If no, explain.	329
2. Has facility received hazardous waste from a foreign source?	Voc. Yvo
a. If yes, has it filed a notice with the Regional Administrator?	Yes <u>X</u> NoNA
Waste Analysis	_Yes _No XNA
3. Does facility maintain a copy of the waste analysis plan at the facility?a. If yes, does it include: (264.13) (265.13)	Yes _No _NA
1. Parameters for which each waste will be analyzed? 2. Test methods used to test for these parameters? (DATED) (x. EPTEA) 3. Sampling method used to obtain sample? 4. Frequency with which the initial analyses will be reviewed or repeated? 5. (For offsite facilities) waste analyses that generators have agreed to supply? 6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:	XYesNoNA XYesNoNA XYesNoNA YesNoNA YesNoXNA
 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 XNA
4. Does the facility provide adequate security through: (2	YesNo _XNA
monitoring or guarde)?	
OR VISITORS ARE DIRECTED TO THE OFFICE BEFORE ENTERING PLANT. PLANT OPERATION 24 HRS DAY	_Yes <u>X</u> no _na

A. Door at	
To Does the Owner/Operators.	
4. Does the owner/operator keep a written operating record at the facility? (264.73) (265.73)	
(264.73) (265.73)	N. T.
de If voe donn to	XYes No ENA
a. If yes, does it include:	
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
 Description and quantity of each hazardous waste received? 	
waste received?	
2. Methods and dates of treatment, storage, a disposal?	_Yes _No _NA
disposal?	nd — —
3. Location and quantity of each hazardous was	Yes No INA
at each location?	ste
4. Cross-references to manifest	_Yes _No _INA
4. Cross-references to manifests/shipping papers?	The Mark
5. Records and regular as	Ayes _No ANA
6. Report of incidents involving implementation of the contingency plan?	Type -No 3km
of the continue involving implementation	Yes No NA
/· Records and many	Vv " A
7. Records and results of required inspections 8. Monitoring, testing, and analytical	2 NO WINA
Groundwater	? Xes No NA
groundwater required by Subpart F?	· λ
	Yes _No ANA
facilities, post-closure cost estimates (Part 264)?	1
10. Notices of con-	Ma
	Yes _No _NA
264.12(b) (Part 264)?	
b. Doge family	_Yes _No _NA
b. Does facility have copy of permit on site?	
5. Does the second angul	Yes _No _NA
5. Does the facility submit a biennial report by March 1 every every every dear? (264.75) (265.75)	
every every every year? (264.75) (265.75)	V
a. If ves. do money.	X_{Yes} _No _NA
- 100, do reports compain	
information:	
•	
1. EPA I.D. number?	
4. Date and year command.	Yes No NA
	XYes No NA
4. Treatment, storage, and disposal methods? 5. Monitoring data under Section 200	XYes No NA
5. Monitoring data under Section 265.94(a)(2) and (b)(2) (Part 265)?	7 ···
and (h)(2) (harder Section 265.94(a)(2)	OK IES NO NA
\-/\&/ \FAPP 7EE\a	XYes _No _NA
and (b)(2) (Part 265)? 6. Most recent closure and	
6. Most recent closure and post-closure cost	X Yes _No _NA
6. Most recent closure and post-closure cost	XYes _No _NA
estiantes? 7. For TSD generators	
6. Most recent closure and post-closure cost estiamtes? 7. For TSD generators, description of efforts to reduce volume/towisite.	XYes _No _NA
6. Most recent closure and post-closure cost estiamtes? 7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated.	XYes _No _NA
6. Most recent closure and post-closure cost estiamtes? 7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated.	XYes _No _NA
6. Most recent closure and post-closure cost estiamtes? 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?	XYes _No _NA
6. Most recent closurs and post-closure cost estiamtes? 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? 6. Has the facility received.	XYes _No _NA
6. Most recent closurs and post-closure cost estiamtes? 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? 6. Has the facility received any waste (that does not come under the small generate.)	XYes _No _NA
estiamtes? 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? 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)	XYes _No _NA XYes _No _NA XYes _No _NA XYes _No _NA
6. Most recent closurs and post-closure cost estiamtes? 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? 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)	XYes _No _NA XYes _No _NA XYes _No _NA XYes _No _NA
6. Most recent closurs and post-closure cost estiamtes? 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? 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) a. If yes, has be submitted.	XYes _No _NA
6. Most recent closurs and post-closure cost estiamtes? 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? 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) a. If yes, has be submitted.	XYes _No _NA XYes _No _NA XYes _No _NA XYes _No _NA
6. Most recent closurs and post-closure cost estiamtes? 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? 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) a. If yes, has he submitted an unmanifested waste report to the Executive Director?	XYes _No _NA XYes _No _NA XYes _No _NA XYes _No _NA

	Section C - Contingency Plan and Emergency Procedures	
	1. Is a contingency plan maintained at the facility? (264.53) (265.53)	Kes _No _NA
	a. If yes, is it a revised SPCC Plan?	_Yes Yno _na
	b. Does contingency plan include: (264.52) (265.52)	- - -
	 Arrangements with local emergency response organizations? Emergency coordinator's names, phone numbers and addresses? 	Yes No NA
<u>.</u>	3. List of all emergency equipment at facility and descriptions of equipment?4. Evacuation plan for facility personnel?	Yes No NA
8	at all times? (264.55) (265.55)	Yes _No _NA
	ection D - Manifest System, Recordkeeping, and Reporting	
1.	(265.71) a. If yes, does the owner/operator need to the owner/operator nee	_Yes XNO _NA
	A CONTRACT OF THE CONTRACT OF	YesNo _XNA
_	 Are the manifests signed and dated and returned to the generator? Is a signed copy given to the transporter? 	Yes No NA
۷.	Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71)	Yes Xnona
	a. If yes, is it accompanied by a shipping paper?	_Yes _No XNA
	1. Does the owner/operator sign and date the shipping paper and return a copy to the generator?	
	2. Is a signed copy given to the transporter?	_YesNo _XNA
3.	Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72)	Ē.
	a. If yes, has he attempted to reconsist and	_Yes _No KNA
	enerator 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)	
		de de
	a. Internal communication or alarm system?	
	1. Is it easily accessible in case of emergency	? Xres _No _N
	b. Telephone or two-way radio to call emergency	
	response bersouwers.	Yes No N
	c. Portable fire extinguishers, fire control equipmen	
	spill control equipment, and decontamination	at,
	equipment?	Y
		χ _{Yes No}
	d. Water of adequate volume of hoses, sprinkers, or	
	water spray system?	V
	1. Describe round	
	1. Describe source of water City of Column	308
3.	Is there sufficient aisle space to allow unobstructed	
	movement of personnel and amount allow unobstructed	3
	movement of personnel and equipment? (264.35)(265.35)	Yes No NI
4.	Has the owner/opens	225
	THE THE TWO THE PARTY TO THE TARREST	
	THE PERSON LARVOUT OF PRACTICAL	
		uous 1:baa
		rrey
	(264.37) (265.37)	X
	,	Yes _No _NA
5.	In the case that more than one police or fire department	
	might respond, is there a designant	· U
	might respond, is there a designated primary authority? (264.37)	_Yes No X NA
39	(
	a. If yes, name primary authority	
7	V III	
6.	Does the owner/operator have phone numbers of and	
	agreements with State operance	
	agreements with State emergency response teams, emergence response contractors, and equipment	у .
555	1264 37) (265 37)	_
•	(204.37) (203.37)	Yes _No _NA
		•
	a. Are they really available to all personnel?	Yes No NA
7.	1 miles	7
	hospitals with the arranged to familiarize local	gr 1941 ar
	orproduct of releases at the facility /264 221	
	(265.37) (264.37)	Y
	-	Yes _No _NA
8.	If State or local authorities declined to enter into	— —
	agreements, is this entered to enter into	
	agreements, is this entered in the operating record? (264.37) (265.37)	Ves No XNA

	How	long are they kept?IMOEFINITE	
	a.	If yes, do they include:	
	- 6	Y. Job title and written job description of each position?	of 18
		 Description of type and amount of training? Records of training given to facility 	Yes No N
		to the second of the second of the second of	KAS No N
R	equire:	ments for Ignitable, Reactive, or Incompatible Wast	.0
	(-0	7	
8		s facility handle ignitable or reactive wastes?	Yes
	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 procedure 2. If no, use narrative explanation sheet to describe sources of ignition or reaction.	es.
	b.	Are smoking and open flames confined to specifical designated locations?	_yes _no <u>K</u> na
	c.	Are "No Smoking" signs posted in hazardous areas?	_Yes _No NA
		Are precautions documented (Part 264 only)?	
9.		containers	
		Are containers leaking or corroding?	_Yes _No _NA
	b.	Is there evidence of heat generation from incompatible wastes?	YesNo &_NA
Sec	tion B	- Preparedness and Prevention	
1.	Is th	ere evidence of fire, explosion, or contamination e environment? (264.31) (265.31)	Yes <u>X</u> NoNA
	If ye	s, use narrative explanation sheet to explain.	_, _
41		e E	

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*

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.

		Y	
If	yes,	9. Does generator retain copies of manifests?	Yes _No _NA
	a.	1. Did generator sign and date all manifests? 2. Who signed for generator? Name have Suan Title	Yes No NA
)×	b.	1. Did generator obtain handwritten signature and date of acceptance from initial transporter? 2. Who signed and dated for transporter? Name Title	V
T	d. e.	Does generator retain one copy of manifest signed by generator and transporter? Do returned copies of manifest include facility owner/operator signature and date of acceptance? Does generator retain copies for 3 years?	Yes _No _NA Yes _No _NA Yes _No _NA
Sect:	ion (C - Hazardous Waste Determination	
		medical waste Determination	
1. I	Does O (L:	generator generate solid waste(s) listed in Subpartist of Hazardous Waste)? (261.30)	TYPE NO NA
	a.	If yes, list waste and quantities (include EPA Hazardous Waste No.) Fo3	
		generator solid waste(s) listed in Subpart C that it hazadous characteristics? (corrosivity, ability, reactivity, EP toxicity) (261.20)	Yes No NA
8	a.	If yes, list wastes and quantities (include EPA Hazardous Waste No.)	2 PARTS WAS ARR
1	b. 1	Does generator determine characteristics by testing or by applying knowledge of processes? That were	SOLVENT COULD IS SOLVENT TES TED
		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)	
a. If yes, EPA I.D. No. 990866329	.0. 1.
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 offiste facility(s).	
2. Does generator use manifest? (262.20)	\cancel{X}_{Yes} _No _NA
a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)?	YesNo XNA
If yes, does generator indicate this when sending waste to a TSD facility?	YesNo ½NA
b. If yes, does manifest include the following information?	YesNoNA
•	
 Manifest document No. Generator's name, mailing address, telephone 	Yes No NA
number	Yes No NA
3. Generator EPA I.D. No.	Yes No NA
4. Transporter Name(s) and EPR I.D. No.(s)	Yes No NA
3. a. Facility name, address, and EPA I.D. No.	A Yes No NA
D. 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	ATTER WO WA
name, quantity (weight or vol.), containers	<u>.</u>
(type and number)	Yes No NA
7. Emergency information (optional) (special	
handling instructions, telephone No.) 8. Is the following certification on each	NONA
manifest form?	VYes 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
398	2. If yes, with what frequency? WEEKLYYes _No _NA
	c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line 1 (265.176 - Special Period No NA
	NOTE: If tanks are used, fill out checklist for tanks.
# b	d. Are the containers labeled and marked in accordance with Section D-3, D-4, and D-5 of this form? Yes No YNA
5 3. 0	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.) YesNoNA
2	8. Describe storage area. Use photos and narrative explanation sheet. Row of BoxES PLACED ON DROPAD.
	Section E - Recordkeeping and Records (262.40)
	1. Does generator keep the following reports for 3 years?
8 8	b. Biennial Reports Yes No NA Yes No NA
	c. Exception reports d. Test results Yes No NA Yes No NA
	2. Where are the records kept (at facility or elsewhere)?
	3. Who is in charge of keeping the records?
	Name Tout Herms Title Penns MGR

a. If equivalent 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 nonhazardous characteristics? 1. If no, list wastes and quantities deemed 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) 2. a. Are containers to be shipped leaking or corroding? Yes No Use sheet to describe containers and condition. c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31) Yes No 1. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? 4. Does generator mark each package in accordance with 49 CFR 172? 5. Is each container of 110 gallons or less marked with the following label? (262.32) Yes No 1. 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)				
a. If yes, did generator test all wastes to determine nonhazardous characteristics? 1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary). Send fines Time Time Time Time Time Time Time Time				
a. If yes, did generator test all wastes to determine nonhazardous characteristics? 1. If no, list wastes and quantities deemed nonhazardous waste was produced (use additional sheet if necessary). Self Rods Glow TREATED TIEL WILL TESTED Fore. The Swart NAC Selv Determined by GlA. Not 10 Hours Tak 1934. Section D - Pretransport Requirements 1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30) 2. a. Are containers to be shipped leaking or corroding? Yes No. b. Use sheet to describe containers and condition. c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31) 3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? 4. Does generator mark each package in accordance with 49 CFR 172? 5. Is each container of 110 gallons or less marked with the following label? (262.32) 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)	•	-		9.
1. If no, list wastes and quantities deemed nomhazardous waste was produced (use additional sheet if necessary). SELLY EARLY REAL TRATE THE WELL TEATED FOR. THE WASTE HAC BREAD DETERMINED BY THE NOTE TO THE WASTE HAC BREAD DETERMINED BY THE NOTE TO THE WASTE HAC BREAD DETERMINED BY THE NOTE TO THE TOTAL HAC BREAD DETERMINED BY THE NOTE TO THE TOTAL HAC BREAD DETERMINED BY THE NOTE TO THE TOTAL HAC BREAD DETERMINED BY THE NOTE TO THE	3.	•	Xyes X	o _n
1. If no, list wastes and quantities deemed nomhazardous waste was produced (use additional sheet if necessary). SELLY EARLY REAL TRATE THE WELL TEATED FOR. THE WASTE HAC BREAD DETERMINED BY THE NOTE TO THE WASTE HAC BREAD DETERMINED BY THE NOTE TO THE WASTE HAC BREAD DETERMINED BY THE NOTE TO THE TOTAL HAC BREAD DETERMINED BY THE NOTE TO THE TOTAL HAC BREAD DETERMINED BY THE NOTE TO THE TOTAL HAC BREAD DETERMINED BY THE NOTE TO THE	1965	-	Yes _N	oN
Section D - Pretransport Requirements 1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30) 2. a. Are containers to be shipped leaking or corroding? Yes No b. Use sheet to describe containers and condition. 2. Is there evidence of heat generation from incompatible wastes in the containers? (262.31) 3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? 4. Does generator mark each package in accordance with 49 CFR 172? 5. Is each container of 110 gallons or less marked with the following label? (262.32) 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)		nonhazardous or processes from which non-	·	
Section D - Pretransport Requirements 1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30) 2. a. Are containers to be shipped leaking or corroding? Yes No b. Use sheet to describe containers and condition. 3. Later evidence of heat generation from incompatible wastes in the containers? (262.31) 3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? 4. Does generator mark each package in accordance with 49 CFR 172? 5. Is each container of 110 gallons or less marked with the following label? (262.32) 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)	_			
Section D - Pretransport Requirements 1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30) 2. a. Are containers to be shipped leaking or corroding? Yes No b. Use sheet to describe containers and condition. 3. Lose generator follow DOT labeling requirements in accordance with 49 CFR 172? 4. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? 4. Does generator mark each package in accordance with 49 CFR 172? 5. Is each container of 110 gallons or less marked with the following label? (262.32) 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)		LP. THIS WASTE HAS BEEN DETERMINED BY GO		
1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30) 2. a. Are containers to be shipped leaking or corroding?	NA.	7 10 Hart 136 F034		
1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30) 2. a. Are containers to be shipped leaking or corroding?				
1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30) 2. a. Are containers to be shipped leaking or corroding?		nia B. Burner and B. J.		
173, 178, and 179 (DOT requirements)? (262.30) 2. a. Are containers to be shipped leaking or corroding? b. Use sheet to describe containers and condition. c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31) 3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? 4. Does generator mark each package in accordance with 49 CFR 172? 5. Is each container of 110 gallons or less marked with the following label? (262.32) 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)		tion D - Pretransport Requirements		
b. Use sheet to describe containers and condition. c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31) 3. Does generator follow DOT labeling requirements in accordance with 49 CFR 1722 4. Does generator mark each package in accordance with 49 CFR 172? 5. Is each container of 110 gallons or less marked with the following label? (262.32) 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)	1.		Yes _N	oN
incompatible wastes in the containers? (262.31) Yes No 3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? 4. Does generator mark each package in accordance with 49 CFR 172? 5. Is each container of 110 gallons or less marked with the following label? (262.32) 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)	, 2.	b. Use sheet to describe containers and condition.	_Yes In	ONZ
4. Does generator mark each package in accordance with 49 CFR 172? 5. Is each container of 110 gallons or less marked with the following label? (262.32) 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)			Yes X	o NA
4. Does generator mark each package in accordance with 49 CFR 172? 5. Is each container of 110 gallons or less marked with the following label? (262.32) 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)	. 3.	accordance with 49 CFR 1722	Yes _N	oN
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)	4.	Does generator mark each package in accordance with	Yes _N	м и_ с
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)	5.		YesNo	a KyX
Generator name(s) and address(es)		Label saying: <u>HAZARDOUS WASTE</u> - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy	nai-f	ŧ
Manifest document No		Generator name(s) and address(es)	å,	
Mentiese document No.			**************************************	•
6. Does generator have placards to offer to transporters?		Manifest document No		

Section F - Special Conditions

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

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

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

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

Yes No NA

CONTAINERS CHECKLIST

Sec	tion A - Use and Management (264.171) (265.171)	20.7
1.	Are containers in good condition?	Yes _NoNA
Sec	tion B - Compatibility of Waste With Container (264.17)	2)
1.	Is container made of a material that will not react with the waste which it stores?	Yes _No _NA
Sec	tion C - Management of Containers (264.173) (265.173)	
1.	Is container always closed while holding hazardous waste? Rolloff 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
Sec	tion D - Inspections (264.174) (265.174)	
1.	Does owner/operator inspect containers at least weekly for leaks and deterioration?	Ares _No _NA
Sec	tion E - Containment (Part 264) (264.175)	
1.	Do container storage areas have a containment system?	Mes _No NA
	a. Is the base free of cracks or gaps?	YesNoNA
	b. Is the base sloped or otherwise designed to drain and remove liquids?c. Does the containment system have sufficient	_Yes _No KNA
	capacity to contain 10% of the volume of	
	containers or the volume of the largest container? d. Is any method available to prevent run-on into the	Yes No X/NA
	containment system?	_Yes _No XNA
	e. Is spilled or leaked material or accumulated	
	precipitation removed from the containment area in a timely manner?	YesNo \(\)\(\)\(\)\(\)

Sec	ection F - Ignitable and Reactive Waste (264.176) (265.176)		
	. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property	YesNo _	_NA
Sec	ection G - Incompatible Waste (264.177) (265.177)	1 - 2	
1.	Are incompatible wastes or materials placed in the same containers?	res <u>No </u>	<u>Y</u> na
2.	Are hazardous wastes placed in washed	es <u>No</u>	_
3.	Are incompatible wastes separated from out attack	'es _No /	•
Sect	ction H - Closure (Part 264) (264.178)		
•	At closure, were all hazardous wastes and associated residues removed from the containment system?	esNo <u> </u>	×NA

_Yes _No ANA

Part	

SURFACE IMPOUNDMENTS CHECKLIST

Sec	tion A	A - Design Requirements (264.221) (265.221)			
1.	Does	facility operate one or more surface impoundments?	Yes	No	NA
	a.	liners and a leachate collection system for any new units, replacement of any existing units, or			٧
	b.	lateral expansion of units? Is owner/operator exempt from double-liner leachat collection system requirements because Regional Administrator has determined that impoundment's design will prevent the migration of hazardous	Yes .e	No	₹ _{NA}
		constituents?	Yes	No	<u> X</u> na
	c.	Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)?			
	d.		Yes	No	XNA
		 Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand. 			
	2.8	 Monofill has at least one liner for which there is no evidence of leaking. Monofill is located, designed, and operated to ensure that no migration of constituents into ground or surface water occurs. 	ŧ		
	е.	Does owner/operator take measures to prevent overfilling; wind and wave action; rainfall; run-on; malfunctions of level controllers,		<u> </u>	
		alarms, and other equipment; and human error (Part 264)?	Vas	No	N _N B
	f.	Is impoundment surrounded by dikes (Part 264)?	Yes Yes	No	NA
Sect	ion B	3 - Operating Requirements			
,1.	Does freeb	owner/operator maintain at least 60 cm (2 ft) of operator (265)? (265.222)			
2.	engin	owner/operator have certification from a qualified eer that alternate design features will prevent opping? (Part 265) (265.222)	Yes _	No /	<u>X</u> na

Sec	tion	C - Containment Systems		₹
1.		ll dikes have a protective cover such e or rock? (Part 265) (265.223)	as grass,	_Yes _No _Ni
		rg =		1.24
Sec	tion !	D - Waste Analysis and Trial Tests		
1.	Will	the surface impoundment be used to:	(265.225)	
	a.	Chemically treat a hazardous waste wh substantially different from wastes p	reviously	ر ۔ ۔
	b.	treated in the impoundment? (Part 26 Chemically treat hazardous waste with substantially different process than	1 a 9 % K	YesNoNI
		previously used in that impoundment?		_Yes _No XN
2.		he answer in #1 was yes to any question r/operator:	ns, has the	
	a. b.	Conducted waste analysis or trial tree Obtained written, documented informat treatment of similar wastes under sim- operating conditions?		YesNoYNA
	3	- E		
Sec	tion 1	E - Inspections and Monitoring	e	
1.	Does	the owner/operator:		
		Inspect the freeboard at least one eadday? (265.226)		_Yes _No ANA
	b.	Inspect the surface impoundment include and vegetation at least once per week storms? (264.226) (265.226)	iing dikes and after	YesNoNA
2.		any deteriorations or malfunctions that been remediated?	it have been	+ YesNo \(\frac{1}{2}\)NA
3.	a qua	the owner/operator obtained a certifical alified engineer that the impoundments tural integrity? (264.226)		_Yes _No NA
Sec	tion F	F - Emergency Repairs, Contingency Plan	ns (Part 264)	(264.227)
1.	Does	facility have a contingency plan?	\$1.	Yes _No _NA
	a.	If yes, does plan stipulate that impou	indment be	* *

removed from service under the following conditions:

1. Sudden drop in liquid level?

_Yes _No XNA .

			1.7
	2. Leaking dike?		YesNoNA
	b. Does plan detail the s impoundment from servi	teps to be followed when rece, including:	emoving
*	 Shutting off flow Containing any su Stopping the leak 	rface leakage?	Yes No NA Yes No NA Yes No NA
		al Administrator of problem aks cannot be contained?	Yes No KNA
ę	operator take the nece	noved from service, did own essary precautions to rections impoundment to service	fy
	restored to service, w	noved from service and was was impoundment closed in proved closure plan?	not YesNo 🚵NA
	accordance wrom an app	* **	# : E
<u> Se</u>	tion G - Closure and Post-Cl	Losure (264.228) (265.228)	
1.	Is a closure plan retained	at the facility?	Yes _No _NA
2.	At closure, did owner/opera	itor:	•
	a. Remove standing liquid	•	Yes _No _NA
	b. Remove waste and waste		Yes No NA
	c. Remove liner (Part 265	•	YesNoNA
	d. Remove underlying and soil?	surrounding contaminated	YesNoNA
	e. If not, did owner/oper	cator demonstrate to Region	<u> </u>
		a above materials were non-	
	hazardous (Part 265)?		YesNoNA
	<pre>1. If no, has owner/ and provided post</pre>	operator closed the impount-closure care (Part 265)?	dment. YesNoNA
3.	If regulated under Part 264	4, has owner/operator: (26	4.228)
		ated waste residues, contamosoils, structures, and equ	
	and managed them as ha	zardous waste?	Yes _No _NA
	b. Eliminated free liquid remaining wastes or wa	ds by removing or solidifying steresidues?	ng ' YesNoNA
	c. Stabilized remaining w sufficient to support	wastes to a bearing capacit	Yes _No _NA
	d. Covered the impoundmen		Yes _No _NA
	9		, '\
4.	Did owner/operator leave ar closure (Part 264)? (264.2		NoNA

.

.

5.	In	post-closure, does owner/operator maintain integrity cover and groundwater monitoring system, and prevent on and runoff? (264.228) (265.228)	24	
	OI	on and runoff? (264.228) (265.228)	Yes	No NA
	Luin	on and Islanti. (154.116) (156.116)		
Sect	ion	H - Ignitable and Reactive Wastes (264.229) (265.22	19)	
_				
1.		e ignitable or reactive wastes placed in the coundment?	Yes	_No XNA
	тир	Suitement:		- 4
-		Park to the first term of the		
	a.	If yes, are they treated, rendered, or mixed		
		before or immediately after placement in the		
		<pre>impoundment so it no longer meets the definition of ignitable or reactive?</pre>	VAS	NO YNA
OR		or idultable of legiciaes		——— —
J. .	ъ.	Is the impoundment used solely for emergencies?	Yes	NoNA noXna
				7
		1		
Sec	tion	I - Incompatible Wastes (264.230) (265.230)		tan sann
1	Are	incompatible wastes placed in the impoundment?	Yes	No NA
1.	VIE	e incompatible wastes placed in the impoundment?		
				Ė
		ē		

Your Barrier Barrier

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

Waste Name: Waste Code:	Rentamental	716
Process Generating Waste:		
How was determination made?Knowledge of Waste. DescribeTesting. Describe.		
Waste Generation Rate (may be estimate Disposal Procedure:	ed)	
Site/Firm:	A CONTRACTOR OF THE CONTRACTOR	5.00 (100,000)
Is waste subject to requirements of Mr. Describe.		- 1
	(Mag) 1	1878
Is waste excluded under MHWMR, 261.4? Describe.	Yes_ No_	
	4. *	

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

Waste Name: Waste Code: Process Generating Waste: Clean			100
How was determination made? Knowledge of Waste. Describe. Testing. Describe.			Kon Kon
Waste Generation Rate (may be estimate Disposal Procedure:		39.96	ens 1991
Site/Firm: Chea Waste Is waste subject to requirements of M Describe.	HWMR 268? Yes	МоЖ	2-34
Is waste excluded under MHWMR 261.4?	Yes_ NoX	530 1904 5 94 20	

App	endix I - Satellite Accumulation Area	·
1.	Source/Area: Tile Source/A	*
2.	Type waste: Fozul	
3.	Condition of Containers: 600	
	a. Containers closed?b. Containers properly labeled?	Yes No NA
4.	<pre>If > 55 gallons accumulated, has generator complied with 262.34(c)(2)?</pre>	_Yes _No XN

Part

GROUNDWATER MONITORING CHECKLIST

Section A - Monitoring System	1 1 Se 20 0 x 12.
1. Does the facility have a groundwater monitoring system in operation?	$\chi_{\rm Yes}$ _No _NA
a. Tif yes, does the system consist of: (265.91	
1. At least one upgradient/background well 2. At least three downgradient wells?	? Yes No NA
b. Are wells identified in the field? Maken?	Yes _No _NA
c. Are well heads in good condition (i.e. free cracks)?	Yes _No _NA
d. Are well heads locked?	XYes _No _NA
e. Do well heads have bumper guards or are other protected? Gone Wart & Grant	erwiseYesNoNA
Section B - Sampling and Analysis (Part 264)	1254
 Does the facility obtain and analyze samples from groundwater monitoring system? 	Yes _No _NA
 Has facility developed and followed a groundwater sampling and analysis plan? (264.97(d)) 	YesNoNA
a. If yes, does this plan include procedures and techniques for:	nd"
1. Sample collection? 2. Sample preservation? 3. Analytical procedures?	Yes No NA
74. Chain-of-custody control?5. Determining the groundwater surface	Yes No NA
3. Has facility specified a statistical method to be in evaluating groundwater monitoring data?	YesNoNA
4. Is all groundwater monitoring data recorded in the operating record?	te

Section C - Detection Monitoring Program (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:
 - Background values?
 Determination of groundwater flow rate and
- Yes _No _NA
- direction annually? (264.98(e))

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

Yes No NA

- 4. If there was a statistically significant increase indicated, did the facility notify the Executive Director per 264.98(g)(1)?
 - Did facility attempt to demonstrate an apparent increase was not caused by a regulated unit per MHWMR 264.98(g)(6)?

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

 Yes _No _

Section D - Compliance Monitoring Program (264.99)

Does the facility operate a compliance monitoring program?

ملاقدين

res No NA

- a. If yes, does the facility:
 - Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e))
- Yes _No _NA
- Collect at least four samples from each well at least semi-annually? (264.99(f))
 Determine whether there is statistically
 - Yes _No _NA
- significant evidence of increased contamination at each monitoring well?

 4. If an increase was indicated, did facility
 - ty Yes No NA
- notify the Executive Director?

 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?

Section	F -	Sampling	and	Analysi	s (Part	2651	,
		0E>		/	200	2	١

	ection	F - Sampling and Analysis (Fall 2007)	
	l. Has	the facility developed and followed a groundwater pling and analysis plan?	Pres _No AMA
		the sleep include procedures and	10
	a.	- V250. V	1
		techniques for:	
	5	A STATE OF THE PARTY OF THE PAR	Tres No ANA
		1. Sample collection?	TIES NO TINA
		2. Sample preservation?	Yes No NA
		3. Analytical procedure? 4. Chain-of-custody control?	Tres No JNA
		4. Chain-of-custody control:	7 - 7
	7 Une	the owner/operator established initial background	
	2. Has	centrations or values of all parameters specified in	
	265	3.92(b)?	Yes No ANA
	200	5.74(W)·	_ _
	a	Samples collected to establish background quality	4
	•	(from above)?	Tyes _No 4NA
	b.		
-		above)?	Tyes _No ANA
	· c.	. Elevation of groundwater surface at each monitorin	W
•		well at each sampling event?	Yes _No XNA
			<i></i>
	Section	G - Preparation, Evaluation, and Response (Part 265	<u>only)</u> (265.93)
	1. Die	d owner/operator prepare an outline of a groundwater	# 1 vs
	qu	ality assessment program?	Zes _No ANA
	-	x c www.	•
	a	. If yes, did program determine the following:	
	0		2 2
	7.62	1. Whether hazardous waste or hazardous waste	Yes _No ANA
		constituents have entered the groundwater?	Kies -uo tus
		2. Rate and extent of hazardous waste or	Yes _No ANA
		hazardous waste constituent migration?	
		3. Concentrations of hazardous waste or hazardou	Yes _No INA
		waste constituents in groundwater?	Ties - wo the
		Section 1	•
	ב	. For each well, has owner/operator calculated the	
		arithmatic mean and variance, based on four replic	ate
		measurements for each sample, and compared the res	Yes No (NA
		with initial background mean?	Ties Sive thus
			·
	c	. Has owner/operator submitted information documents	ing
		any significant increase in comparisons for up-	YesNoNA
		gradient wells (or decrease in pH)?	Ties Tue Thy
15			
	C	i. If the comparisons for downgradient wells show a	1
		significant increase (or pH decrease), has the own	ner/
		operator obtained additional groundwater samples	rom

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) If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Yes __No XNA Administrator within 7 days? 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 Yes No NA groundwater quality assessment program? Did owner/operator implement the groundwater quality assessment program and, at a minimum, did he determine the following: Rate and extent of migration of the hazardous waste constituents in the groundwater? Concentrations of the hazardous waste Yes __No in the groundwater? Did owner/operator submit a report to the Executive Director containing the requests of the assessment outlined in No. 3 above within 15 days? Did owner/operator notify the Executive Director of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents Yes _No _NA had entered the groundwater? 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 _Yes __No ANA during post-closure? 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, Yes as outlined in No. 4 above? 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 ANA

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...

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

- 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 evaluations 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

 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 O(A

If groundwater is monitored to satisfy requirements of Section 265.93(d)(4), did owner/operator do the following: Keep records of analyses and evaluations specified in the plan throughout active life and post-Yes _No √NA closure? (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 Yes No NA

by March 1?

Sange and the sange of the sang

73.293

part ____

FINANCIAL REQUIREMENTS CHECKLIST

Sec	tion A - Closure	
	Total Section of the	*
1.	Is facility required to provide financial assurance	van va Afra
	for closure?	YesNoWA
	المراجع	
	a. Type of financial assurance	200 AV
	b. Amount of closure costs	
	1. Date of most recent adjustment	× 1
	mee siki of machanism	
		. 1
		Yes No NA
	e. Is instrument adequate?	
Sec	tion B - Post-Closure	
_	- deliteind to promide disencial aggurance	
1.	Is facility required to provide financial assurance	Yes No NA
	for post-closure care?	—,,,, —,,,,
	Tas	سو
	a. Type of financial assurance Financial (6)	1
	b. Amount of closure costs 452,000	11
		<u></u>
	c. Effective date of mechanism Mach May	
	d. Expiration date of mechanism	
•	e. Is instrument adequate?	XYes No NA
Sec	ction C - Corrective Action	
300		3
1.	Is facility required to provide financial assurance for	1.
*•	corrective action?	Yes No NA
	(011606114 80610	- -
	a. Type of financial assurance F. A.C. TES	
		<u> </u>
	b. Amount of thesure costs 177,000	944
	1. Date of most recent adjustment	
	c. Effective date of mechanism	,
	d. Expiration date of mechanism	Wa Wa
	e. Is instrument adequate?	XYes _No _NA
	* *	
Se	ction D - Liability Requirements	
<u> </u>		
1.	Is facility required to provide liability coverage for	
	sudden accidental occurrences?	Yes _No _NA
	•	- -
	a. Type of assurance Financia Trat	
	a. Type of assurance Fix Ave to	
	b. Is amount at least \$1 million per occurrence, \$2	xesNoNA
	million annual aggregate? c. Effective date of mechanism	-√as -,,, -,,,
	c. Effective date of mechanism	

	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 Finance That b. Is amount at least \$3 million per occurrence, \$6 million annual aggregate? c. Effective date of mechanism March 1995 d. Expiration date of mechanism March 1995
28	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1

CHCKLIST: 1r

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

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?
- 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?
 - a. Is the assessment recertified annually?
- 4. Is the drip pad constructed of non-earthen material with the exception of wood and non-structurally supported asphalt?
- 5. Is the drip pad sloped to free-drain drippage and precipitation?
- 6. Does the drip pad have a curb or berm around the perimeter?
- 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)
- 8. Is there a synthetic liner below the drip pad?
- 9. Is there a leakage detection system immediately above the liner?
- 10. Is there a leakage detection system immediately above the liner?
 - a. Is the date, time, and quantity of any leakage removal documented in the operating log?
- 11. Is the drip pad free of cracks, gaps and corrosion?
- 12. Does the operator maintain a run-on control system?

yes no





1988





yesno

(yes no

yes no

yes no

yes no v

yes no VA

yes no p

yes no

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 yes no

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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. Pentachlorphenol 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.

Conclusions 10.

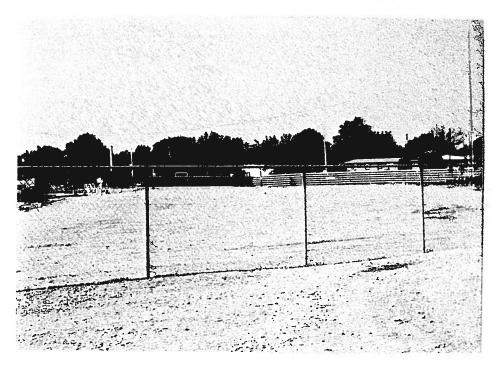
The facility was found to be in compliance with the applicable regulations and the Post-Closure permit.

11. Signatures

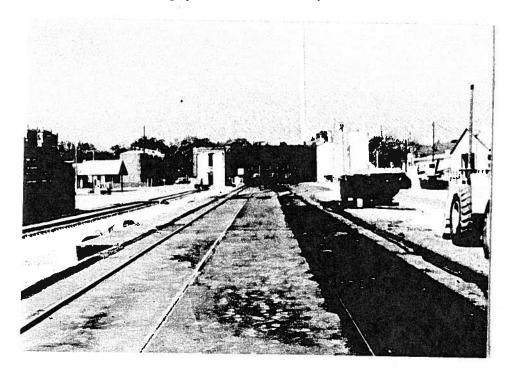
Bruce Ferguson, Inspector

David Peacock, Supervisor

9/22/97



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

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General Site Inspection Form

General Facility Checklist

Land Disposal Restrictions Checklist

Generator Checklist

Transporter Checklist

Container Checklist

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Landfills Checklist

Incinerators Checklist

Groundwater Monitoring Checklist

Financial Requirements

List of Appendices

Part 1

General Site Information

Facility Name: Address:	Herr-Meloce	Chemical Corp	soration		
I.D. Number: Contact: Title: Phone Number:	MSD 990 Steve Lada	8			
Type of Ownersh	ip:				
Federal _	State .	County	Municipal	Private	
Facility Status				,	*
Generator	Transpo	orterTrea	tmentSt	orage <u>X</u> Di	.sposal
Regulatory Stat				1	
Interim Sta	15	Part B	Submitted in Preparatio		
Principal Inspe	octor Name:	ROLLE FERRIS	0~ / Ti+1	a Rett	
Organization:	MOEQ	Pho	one Number:	Con-961-514	7
Inspection Part	icipants:				
Name Duc Lada		<u>Title</u>		esenting KmCC	
James Tan	10-			KMCE	
Por-ce Fe	rgusen		1	mole	
			-17 - 351 1 -1951		
			•		
				•	

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GENERAL FACILITY CHECKLIST

Sec	ction	A - 0	General Facility Standards	
1.	Does	s fac:	llity have EPA Identification No.?	Yes _No _N
	a.	If y If r	ves, EPA I.D. No.	
2.	Has sour	faci] rce?	ity received hazardous waste from a foreign	_Yes _No _N
	a.	If y Admi	res, has it filed a notice with the Regional nistrator?	_Yes _No_N
Was	te Ar	nalysi	<u>.s</u>	
3.	Does plan	faci at t	lity maintain a copy of the waste analysis he facility?	YesNoNA
	a.	If y	es, does it include: (264.13) (265.13)	
	À	1.	Parameters for which each waste will be analyzed?	of You was
			Test methods used to test for these parameters?	Yes No NA
		4.	Sampling method used to obtain sample? 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 _Yes _No ANA
		6.	(For offsite facilities) procedures which are used to inspect and analyze each movement of mazardous waste, including:	
		15	a. Procedures to be used to determine the identity of each movement of waste. 5. Sampling method to be used to obtain representative sample of the waste to be	_Yes _No ANA
			identified.	YesNo <_NA
•	Does	the f	acility provide adequate security through: (264.14) (265.14)
	a.	24-ho monit	our surveillance system (e.g., television oring or guards)?	YesNoNA

	b.	1.	Artificial or natural barrier around facility (e.g., fence or fence and cliff)?	∆ Yes	No	NA
			Describe Sence	1		
			AND			
		2.	Means to control entry through entrances (e.g. attendant, television monitors, locked entrance controlled roadway access)?	e, Yes	No	NA
			Describe			
<u>Ge</u>			ection Requirements (264.15) (265.15)	50		
	the	faci	owner/operator maintain a written schedule at lity for inspecting:			
	c. d.	Safe Secu Oper	itoring equipment? ety and emergency equipment? erity devices: eating and structural equipment?	Yes Yes Yes Yes		NA NA
	e.	Туре	es of problems of equipment:		—···· ·	—" "
		2. 3.	Malfunction Operator error Discharges	Yes	No _	 Na
6.	Does	the	owner/operator maintain an inspection log?	Yes	No	_NA
	a.	If y	es, does it include:			_
75		3.	Date and time of inspection? Name of inspector? Notation of observations? Date and nature of repairs or remedial action? Identification of potential problems?	Yes Yes	No _ No _ No _	_ _NA
	b.	Are 1	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
Per	sonnel	Trai	ning (264.16) (265.16)			
7.	Does recor	the c	wner/operator maintain personnel training the facility?		_No _	_NA
	Date	of mo	st recent training: 34 97	\		

			_			
				•		
	How	long are they kept?	indohn	Le		
	a.	If yes, do they inc	lude:			
		1. Job title and w position?	ritten job desc	ription of each	_	
		 Description of 	type and amount	of trainings	Yes	NoNA
		3. Records of trai	ning given to f	or training:		NoNA
	12	personnel?	ming given to i	actifity .	1/4	**-
		personner.			Yes	NoNA
	Requirem	ents for Ignitable,	Reactive or T	ncompatible Wa	***	
	(264	.17) (265.17)	Medctive, Of 1	ncompatible was	ste	
W.	•	, (2001 <u>2</u> .)				
	8. Does	facility handle ig	nitable or reac	tive wastes?	Yes	∑No _NA
	a.	If yes, is waste s	eparated and co	nfined from		
		sources of ignition	n or reaction (open flames.		
		smoking, cutting a	nd welding, hot	surfaces		
		frictional heat),	sparks (static	electrical		
		or mechanical), sp	ontaneous ignit	ion (o.c.		
		from heat-producing	c chemical rasc	tions)		
		radiant heat?	y onemical reac	cions), and		
		 If yes, use no 	arrative explan	ation sheet to		
		describe sepa	ration and conf.	inement procedu	res.	
		2. If no, use na	rrative explana [.]	tion sheet to		
		describe sour	ces of ignition	or reaction.		
	-					
	b.	Are smoking and ope	en flames confi	ned to specific	ally	
		designated location	ns?			NoNA
	c.	Are "No Smoking" s:	igns posted in 1	hazardous areas	?Yes	No NA
						— •
	d.	Are precautions do	cumented (Part 2	264 only)?	Yes	No NA
	9. Chec	k containers				
		_				_
	a.	Are containers lead	cing or corroding	ng?	Yes 🛭	NO NA
		-				No NA
	ь.		of heat generati	ion from		
		incompatible wastes	3?		Yes/ λ	NO NA
					>+	-
()	Section 1	B - Preparedness and	Prevention			
	9					
	i. Is the	nere evidence of fir	e, explosion, o	or contaminatio	n ,	
	of the	ne environment? (26	34.31) (265.31)		_ Yes 🕽	No NA
						_
	If ye	es, use narrative ex	planation 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
3.6	b. Telephone or two-way radio to call emergency response personnel?	•	No _	
	c. Portable fire extinguishers, fire control equipment spill control equipment, and decontamination equipment?		No _	NA
	d. Water of adequate volume of hoses, sprinkers, or water spray system?	Yes	No _	NA
	1. Describe source of water			
	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 hazard waste handled and associated hazards, places where facil personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (264.37) (265.37)	lity	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)		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)		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 _		-
				-

Sec	tion 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)	No. 1
	 Arrangements with local emergency response organizations? Emergency coordinator's names, phone numbers 	YesNoNA
	and addresses? 3. List of all emergency equipment at facility	YesNoNA
	and descriptions of equipment? 4. Evacuation plan for facility personnel?	YesNoNA YesNoNA
2.		YesNoNA
Sec	tion D - Manifest System, Recordkeeping, and Reporting	
1.	Does facility receive waste from offsite? (264.71) (265.71)	_Yes KNo _NA
	a. If yes, does the owner/operator retain copies of all manifests?	YesNo X_NA
	 Are the manifests signed and dated and returned to the generator? Is a signed copy given to the transporter? 	Yes No XNA
2.	Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71)	Yes ZNONA
	a. If yes, is it accompanied by a shipping paper?	_Yes _No NA
	 Does the owner/operator sign and date the shipping paper and return a copy to the generator? Is a signed copy given to the transporter? 	YesNoNA YesNoNA
3.	Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72)	_Yes \(\sqrt{No _NA} \)
	a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter?	YesNo _NA
	1. If no, has Regional Administrator been	

notified?

_Yes _No _NA

4.	Does	the c	owner/operator keep a written operating		
	reco	rd at	the facility? (264.73) (265.73)	Yes	_No _NA
	a.	If ye	es, does it include:		
		1.	Description and quantity of each hazardous		
			waste received?	Yes	NoNA
			Methods and dates of treatment, storage, and		
			disposal?	Yes	No NA
		3.	Location and quantity of each hazardous waste	_	
			at each location?	Yes	NoNA
			Cross-references to manifests/shipping		
			papers?	Yes	NoNA
		5.	Records and results of waste analyses?	Yes	NoNA
		٥.	Report of incidents involving implementation		±
595		7	of the contingency plan?	—Yes	_No _NA
		8.	Records and results of required inspections? Monitoring, testing, and analytical data, for	— ^{Yes}	_No _NA
		٠.	groundwater required by Subpart F?		No NA
		9.	Closure cost estimates and, for disposal	—Yes	NONA
			facilities, post-closure cost estimates		
			(Part 264)?	Yes	NO NA
		10.	Notices of generators as specified in Section		
			264.12(b) (Part 264)?	Yes	NoNA
	b.	Does	facility have copy of permit on site?	Yes	_No _NA
5.	Does	the f	facility submit a biennial report by March 1		
٠.	ever	y even	n-numbered year? (264.75) (265.75)	Nyon	NoNA
		-	(2000)	4-160	
	a.	If ye	es, do reports contain the following		
			mation:		
		< _		,	
			EPA I.D. number?	Yes	_No _NA
		2.	Date and year covered by report?	Yes	_No _NA
		3. 4.	Description/quantity of hazardous waste?	Yes	_No _NA
			Treatment, storage, and disposal methods?	Yes	NoNA
			Monitoring data under Section 265.94(a)(2) and (b)(2) (Part 265)?	~ vac	No M
			Most recent closure and post-closure cost	∠ ies	NoNA
			estiamtes?	2 vac	_No _NA
			For TSD generators, description of efforts	7,50	
			to reduce volume/toxicity of waste generated,		
			and actual comparisons with previous year?	/ Yes	No NA
		8.	Certification signed by owner/operator?	Yes	NoNA NoNA
6.	Has 1	the fa	cility received any waste (that does not come	•	
- •	unde	r the	small generator exclusion) not accompanied		
	by a	manif	est? (264.76) (265.76)	Vae	No NA
	•				4" - "A
	a.	If ye	s, has he submitted an unmanifested waste		
		repor	t to the Executive Director?	Yes	_No XNA
					一 / て

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

1	Pa.	rt	
4		. .	

GENERATOR'S CHECKLIST

sec	CION A	S - EPA Identification No.	
1.	Does	generator have EPA I.D. No.? (262.12)	YesNoNA
	a.	If yes, EPA I.D. No	· n
Sec	tion 1	3 - 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 offiste facility(s).	
2.	Does	generator use manifest? (262.20)	YesNoNA
	a.	If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)?	YesNo 4\(\)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
		 Manifest document No. Generator's name, mailing address, telephone 	Yes _No _NA
		number	Yes No NA
		3. Generator EPA I.D. No.	Yes No NA
		 Transporter Name(s) and EPA I.D. No.(s) a. Facility name, address, and EPA I.D. No. 	Yes No NA
		b. Alternate facility name, address, and EPA 1.D. No.	
		I.D. No.	Yes _No _NA
		c. Instructions to return to generator if	
		undeliverable	Yes No NA
		undeliverable 6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers	
		(type and number)7. Emergency information (optional) (special	Yes No NA
		handling instructions, telephone No.)	AVOR NO NA
		8. Is the following certification on each	≪Yes _No _NA
		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. Doe	es gen e ra	ator retain co	opies of manifests?	? Yes	NoNA
If y	es, c	complete	a through	gh e.			
	a.		_	or sign and da for generator	ate all manifests? ?	⊻Yes _Yes	NoNA NoNA
		Name			Title		
	b.	date	of acc	eptance from	dwritten signature initial transporte: transporter?	and Yes Yes	NoNA
		Name			Title #		
	đ.	by generation Do return owner/or	rator an rned cop perator	d transporter ies of manife signature and	<pre>py of manifest sign ? st include facility date of acceptance for 3 years?</pre>	ned Yes Y e? Yes	NoNA NoNA NoNA
Sect	ion (C - Haza:	rdous Wa	ste Determina	tion	•	
	Does	generat	or gener		te(s) listed in Su	bpart $ ot\!\underline{\mathscr{X}}$ Yes	nona
	a.	If yes, Hazardo	list wa us Waste	ste and quant No.) <u>F63</u>	ities (include EPA	- 	
2.	exhi	bit haza	dous cha	racteristics?	ted in Subpart C to (corrosivity, city) (261.20)		≤no _na
9	a.	-	list wa us Waste	_	tities (include EP.	A 	
	b.			determine cha knowledge of	racteristics by te	sting	
		te		ds in Part 26	g, did generator u 1, Subpart C (or	se Yes	nona

	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
	 If no, list wastes and quantities deemed nonhazardous or processes from which non- hazardous waste was produced (use additional sheet if necessary). 			
_			¥	
Se	ection D - Pretransport Requirements			
	Does generator package waste in accordance with 49 CFR			
	173, 178, and 179 (DOT requirements)? (262.30)	YYes	—No	—NA
2.	 b. Use sheet to describe containers and condition. c. Is there evidence of heat generation from 		•	
	incompatible wastes in the containers? (262.31)	Yes	TNO	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?	Y Yes	No	NA
5.	Is each container of 110 gallons or less marked with the following label? (262.32)	X _{Yes}		
	Label saying: <u>HAZARDOUS WASTE</u> - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy or public safety authority or the U.S. Environmental Protection Agency.	7		
	Generator name(s) and address(es)			
	Manifest document No.	-	20	
6.	Does generator have placards to offer to transporters? (262.33)	Yes	No	NA
		+==	110	"^

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7. A	Accumulation time: (262.34)
	a. Are containers used to temporarily store waste before transport? YesNoNA
	1. If yes, is each container clearly dated: Also, fill out rest of No. 7 (accum. time) YesNoNA
	b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) YesNoNA 2. If yes, with what frequency?
	2. If yes, with what frequency? walking 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) YesNoNA
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? YesNoNA
NOTE:	: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.
5	e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) YesNANA
8. [Describe storage area. Use photos and narrative explanation sheet.
Secti	ion 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. W	where are the records kept (at facility or elsewhere)?
3. W	tho is in charge of keeping the records?
N	Jame Chick Swan Title

Section F - Special Conditions

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

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

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

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

Yes No NA

Yes No NA

App	endix II - Less-than-Ninety Day Storage	
1.	Source/Data: drums of rollell	
2.	Type(s) of waste: Root of F034	
3.	Condition of containers: Que	
	a. Containers closed?	Yes No NA
	b. Containers properly labelled?	XYes No NA
	c. Accumulation dates?	Yes _No _NA
	d. Area inspected?	YesNoNA

-1

Part ___

CONTAINERS CHECKLIST

Sect	tion A - Use and Management (264.171) (265.171)		
1.	Are containers in good condition?	<u>X</u> Yes	NoNA
Sect	tion B - Compatibility of Waste With Container (264.172	2)	
1.	Is container made of a material that will not react wit the waste which it stores?	Yes	NoNA
Sect	tion C - Management of Containers (264.173) (265.173)		
1.	Is container always closed while holding hazardous waste?	Yes	NoNA
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?	<u>X</u> Yes	NoNA
Sect	tion D - Inspections (264.174) (265.174)		,
1.	Does owner/operator inspect containers at least weekly for leaks and deterioration?	∠ Yes	NoNA
Sect	tion 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?b. Is the base sloped or otherwise designed to	Yes	_no≪na
	drain and remove liquids? c. Does the containment system have sufficient capacity to contain 10% of the volume of	Yes	_no \max_na
F	containers or the volume of the largest container?	_Yes	_No TNA
	d. Is any method available to prevent run-on into the containment system?e. Is spilled or leaked material or accumulated		_no _ na
	precipitation removed from the containment area in a timely manner?	Yes	_no _na

Sect	ion F - Ignitable and Reactive Waste (264.176) (265.176	5)
1.	Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines?	_Yes _No NA
Sect	tion G - Incompatible Waste (264.177) (265.177)	
1.	Are incompatible wastes or materials placed in the same containers?	Yes ANONA
2.	Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?	_Yes _No XNA
3.	Are incompatible wastes separated from each other by a berm, dike, wall, or other device?	YesNo\NA
Sec	tion H - Closure (Part 264) (264.178)	

__Yes __No_NA

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

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)
	 At least one upgradient/background well? 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?	YesNoNA
	e. Do well heads have bumper guards or are otherwise protected?	Yes No NA
Sec	tion B - Sampling and Analysis (Part 264)	
1.	Does the facility obtain and analyze samples from the groundwater monitoring system?	NYesNoNA
2.	Has facility developed and followed a groundwater sampling and analysis plan? (264.97(d))	YesNoNA
	a. If yes, does this plan include procedures and techniques for:	
	 Sample collection? Sample preservation? Analytical procedures? Chain-of-custody control? Determining the groundwater surface elevation? 	Yes _No _NA
3.	Has facility specified a statistical method to be used in evaluating groundwater monitoring data?	YesNoNA
4.	Is all groundwater monitoring data recorded in the operating record?	XYes No NA

Section C - Detection Monitoring Program (264.98)

1.		m to	operator established detection monitoring provide reliable indications for detection	Yes	_n6_na
			es, are the following components included in system:		
		1.	Background values?	Yes	NoNA
		2.	Determination of groundwater flow rate and direction annually? (264.98(e))	Ves	No NA
		3.	Determination of statistically significant		
			increases over background concentrations at	P	
60		4.	each well? (264.98(f)) If there was a statistically significant	Yes	NoNA
		7.	increase indicated, did the facility notify		
			the Executive Director per 264.98(g)(1)?	Yes	NoNA
		5.	Did facility attempt to demonstrate an apparent increase was not caused by a regulat		
			unit per MHWMR 264.98(g)(6)?		No NA
		6.	Is all information contained in the facility'		
			operating record?	Yes	NoNA
Sec	tion D) - c	ompliance Monitoring Program (264.99)		
1.	Does progr		facility operate a compliance monitoring	Voa	No Mar
	progr	. 61113		res	_No NA
	a.	If y	es, does the facility:		
		1.	Determine the groundwater flow rate and		
			direction in the uppermost aquifer annually?		
		2.	(264.99(e)) Collect at least four samples from each well	— ^{Yes}	NoNA
		۷٠	at least semi-annually? (264.99(f))	Yes	No NA
		3.	Determine whether there is statistically		
			significant evidence of increased contaminati		
			at each monitoring well?	Yes	NoNA
		4.	If an increase was indicated, did facility notify the Executive Director?	Vos	No NA
		5.	Analyze samples for constituents listed in	res	NoNA
			Appendix IX of Part 264 at least annually?	Yes	No NA
		6.			
			record?	Yes	_No _NA
Sec	tion E	- C	orrective Action Program (Part 264 only) (26	4.100)	
1.	Does	faci	lity follow a corrective action program that	. 1	
			facility's permit requirements?	Yes	NoNA

Section F - Sampling and Analysis (Part 265)

1.		e facility developed and followed a groundwater ng and analysis plan?	Yes	NoN	A
		f yes, does the plan include procedures and echniques for:	,		
		1. Sample collection?	V Yes	NoN	A
		2. Sample preservation?	X Yes	-No $-$ N	A
		3. Analytical procedure?	XYes	No N	A
		4. Chain-of-custody control?	Yes	NoN	A
2.		e owner/operator established initial background			
		trations or values of all parameters specified in	n	. /	
	265.92	(b)?	Yes	_no \forall n	A
		amples collected to establish background quality			γ,
	•	<pre>from above)? amples collected to indicate contamination (from</pre>	·Yes	NoN	A
		bove)?		NoN	A
		levation of groundwater surface at each monitoring	ng		
	w	ell at each sampling event?	Yes	NoN	A
Sec	tion G	- Preparation, Evaluation, and Response (Part 26	5 only)	(265.93)
1.		ner/operator prepare an outline of a groundwater y assessment program?		_no_n	Â
	a. I	f yes, did program determine the following:			
		1. Whether hazardous waste or hazardous waste			
		constituents have entered the groundwater?	Yes	NoN	A
		2. Rate and extent of hazardous waste or			_
		hazardous waste constituent migration? 3. Concentrations of hazardous waste or hazardous		NoN	A
		waste constituents in groundwater?		NoN	A
	a m	For each well, has owner/operator calculated the crithmatic mean and variance, based on four replications for each sample, and compared the restrict initial background mean?	sults	no n	A
				—·"	-
		as owner/operator submitted information document	ing		
		ny significant increase in comparisons for up-			
	9	radient wells (or decrease in pH)?	Yes	NoN	A
	s	f the comparisons for downgradient wells show a ignificant increase (or pH decrease), has the own perator obtained additional groundwater samples a			

de tw	cre o, mpl	e downgradient wells in which a significant case was detected? (Samples must be split in and analyses must be obtained of all additional es to determine whether the significant		N.	•••
aı	IIE	erence was a result of lab error)	_res	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
		-			
		 Rate and extent of migration of the hazardous waste constituents in the 	(4		
		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?		No	 na
•	·	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	9		
		prior to post-closure care, or cease to make determinations required in No. 3 above if ground water quality assessment plan was implemented		N -	
7	7.	during post-closure? 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.	-	No	NA
9		as outlined in No. 4 above?	•	No	NA
ε	3.	If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on groundwater elevation			

								F above				
			to det	ermine	whether	the r	equire	ments fo	or			
			locati	ing moni	toring t	wells	are sa	tisfied?	?	Yes	No	NA
			a. :	If evalu	ation s	hows t	hat the	e requi	cements	;		
								t satis:				
								the nur				
								onitori		я		
								mpliance		Yes	No	NA
			ו	to bring	the sy	stem 1	into co	mpriance	= •			—
Sect	ion	u _ D	ecordk	eenina a	and Repo	rting	(Part	265 onl	v) (26	55.94)	W I	11
									•-•		\mathcal{W}_l	H
1.	Unle	ss ow	ner/op	erator i	is monit	oring	to sat	isfy th	е			
	requ	ireme	nts of	Section	n 265.93	3(d)(4)), does	owner/				
	oper	ator:										
	a.	Keep	recor	ds of th	he analy	yses re	equired	l in Sec	tion			
		265.	92(c)	and (d)	, ground	iwater	surfac	e eleva	tions			
		recu	ired i	n 265.9	3(b) thr	roughou	ut the	active	life			
								losure?		Yes	No	NA
	b.							he Exec			_	_
	٥.	_	ctor:	. 10110#.	9	J	W.					
		DILE	ector:									
	1	1.	Withi	n 15 day	ys of ar	nalysi	s for e	each qua	rterly			
	ł							ator sub			19	
				ts of b						Yes	No	NA
		2.						Executiv	·e	- 01		_
								nat exce				
								ed in Ap				
			III?		COULT !! CO!! C	16,61	5 11500	<u>.</u>	. P	Yes	No	NA
		-		nally) d		o=/ono	+0r:	report				
		٥.						ameters	listed			
								h well,				
			_			g for	tnese]	paramete	ers und		***	113
			Secti	ion 265.	93(p)?					Yes	NO	NA
			a.	Does ow	ner/ope:	rator	also i	dentify				
				differe	nces fro	om ini	tial ba	ackgrour	nd			
				concent	rations	found	in the	e upgrad	lient			
								1 follow				
					lendar				-	Yes	No	NA
	D		o=/o=o		bmit ==	enl+e	of the	ground	vater			
۷.												
), along	MICH	V	No	NΆ
	a de	escrip	ption o	of the r	esponse	, if n	eeaea?			ies	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 postclosure?

__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

P	art	

FINANCIAL REQUIREMENTS CHECKLIST

Sec	tion A - Closure			
1.	Is facility required to provide financial assurance for closure?	Yes	Kno -	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
	c. 15 instrument designation	~	-	
Sec	ction B - Post-Closure			
	To facility manyined to municipal financial accurance	4		
1.	Is facility required to provide financial assurance for post-closure care?	Yes	No	NA
	- 17.4	4		
	a. Type of financial assurance Financial Test		-	
	b. Amount of closure costs 195, 710		_	
	1. Date of most recent adjustment MARCH 1997	<u>′</u>	-	
	c. Effective date of mechanism April 1997		_	
	d. Expiration date of mechanism Much 31, 199%	1 /2:	- ,,,	173
	e. Is instrument adequate?	Yes	—ио	— ^{NA}
		•		
Se	ction C - Corrective Action			
	8			
1.	Is facility required to provide financial assurance for	x 1		
	corrective action?	Yes	No	-NA
		\		
	a. Type of financial assurance Financial Test			
	b. Amount of crosure costs			
	1. Date of most recent adjustment MARCH 199	<u></u>	_	
	c. Effective date of mechanism April 1997			
	d. Expiration date of mechanism		_	
	e. Is instrument adequate?	Yes	No	NA
		<i>Y</i> (
Se	ection D - Liability Requirements			
1.	Is facility required to provide liability coverage for			
	sudden accidental occurrences?	∕∕Yes	No	NA
		7		
	a. Type of assurance Financial Test			
	b. Is amount at least \$1 million per occurrence, \$2	. /		(3)
	million annual aggregate?	/XYes	No	NA
	Effective data of mechanism Acad 1999	~~		

	d.	Expiration date of mechanism [17] (18)	
2.	Is f	acility required to provide liability coverage non-sudden accidental occurrences? YesNoN	A
	3	Type of assurance Florocial Test	
	b.	Ts amount at least \$3 million per occurrence, \$6	
		million annual aggregate?	A
	c.	Effective date of mechanism	
	d.	Expiration date of mechanism March 3, 1998	

CHCKLIST:1r

	A-Applicability 265.440	<u>Yes</u>	<u>No</u>	<u>NA</u>
	 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? 	Ă		
	 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 	<u>X</u>	X	-
	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?	XXX		·
	B - Degign and operating requirements 265.443	<u>Yes</u>	<u>No</u>	<u>NA</u>
	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? 	$\frac{\chi}{\chi}$.
12/20/9	d. i. Does the drip pad have a hydraulic conductivity of less than or equal to 10°′ cm/s?	<u>X</u> X X		
	If the drip pad complies with 1.d. then skip to 5.			
	2. Is the drip pad constructed with a synthetic liner?		<u>X</u>	
	 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? 		<u> </u>	<u>X</u>
	4. Does the drip pad have a leakage collection system immediately above the liner?		<u> </u>	. —
	5. Is the drip pad maintained free of cracks, gaps, corrosion, or other deteriaration?	<u>K</u> _		
	6. Is the drip pad designed to prevent run-off?	X		
~	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?	4		
	8. Is drippage and accumulated precipitation removed from the associated collection system as necessary to prevent overflow onto the drip pad?	X		

B - Degign 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?

Yes No NA

C - Inspections 265.444

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?



Lest trang 3/11/97

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

96



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,

Bruce Ferguson

Hazardous Waste Division

Enclosure

cc:

Steve Ladner, Kerr-McGee

U. S. EPA, Region IV

FILE COPY

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

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. Pentachlorphenol 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 see 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.

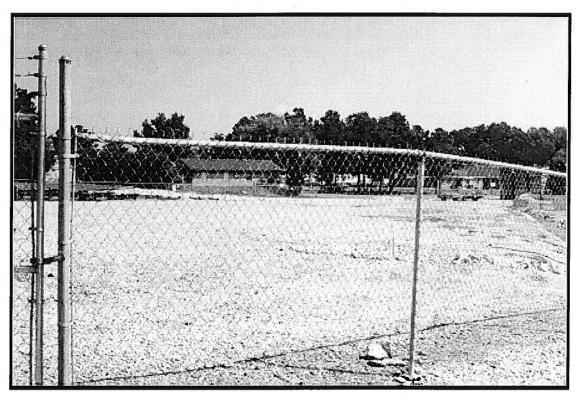
11. Signatures

Bruce Ferguson, Inspector

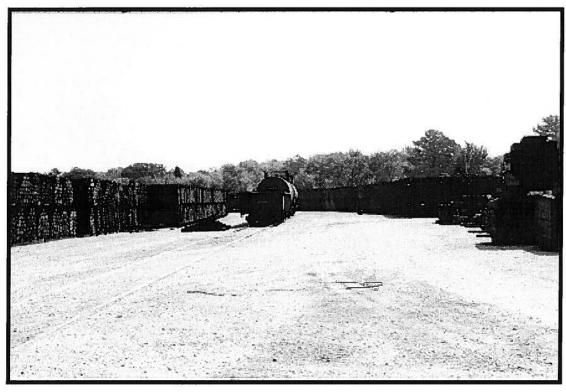
David Peacock, Supervisor

Date

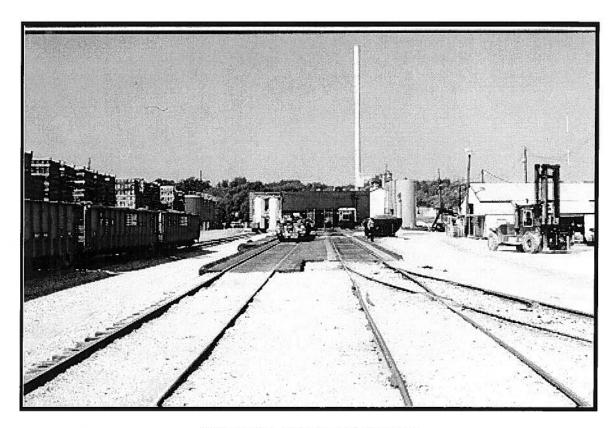
Date



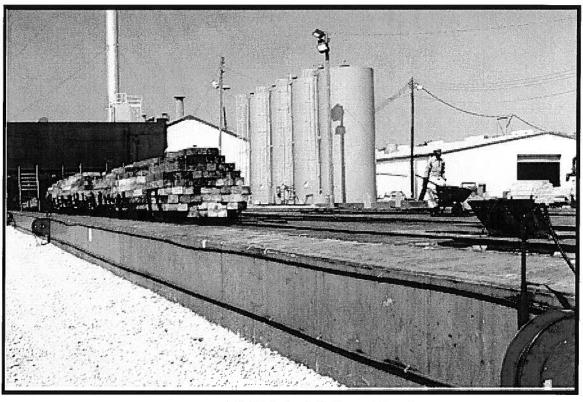
Photograph 1 - Closed surface impoundments.



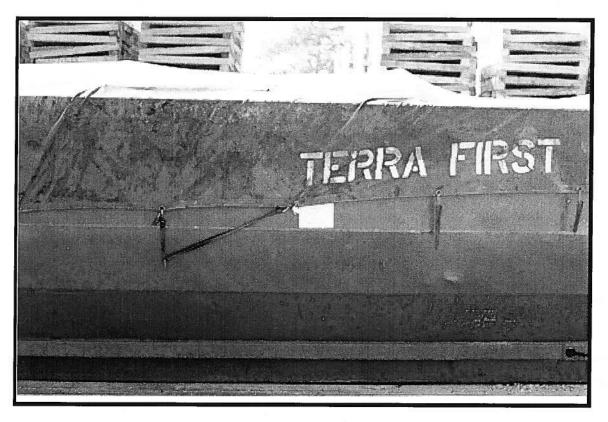
Photograph 2 - Black tie storage area.



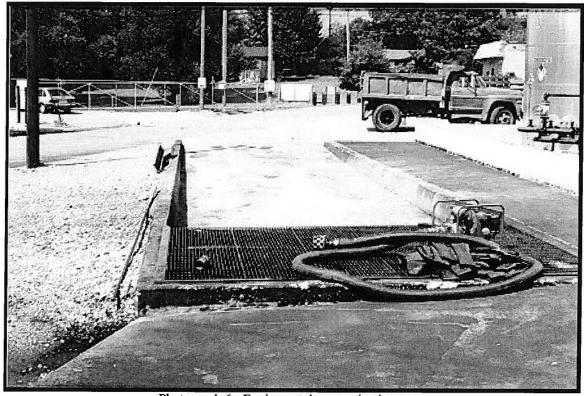
Photograph 3 - Drip track facing west.



Photograph 4 - Drip track facing northwest.



Photograph 5 - Less than 90 day container storage area.



Photograph 6 - Equipment decontamination area.

Part 1

	General Site Info	rmation
Facility Name: Address:	Just-Melxe Chemica	1 Corporation
I.D. Number: Contact:	Chuck Swan	
Title:		
Phone Number:		
Type of Ownersh	ip:	
Federal _	StateCounty	Municipal X Private
Facility Status	•	
X Generator	TransporterTreat	mentStorage <u>×</u> _Disposa:
Regulatory Stat	us:	
Interim Sta	tusPart B Si	ubmitted
Permitted		n Preparation
	MIRO Phone	
Inspection Part	icipants:	
Chiek Suga	<u>Title</u>	Representing
Buce Feros	400	MDEO

la sollo

	b.	1.	Artificial or natural barrier around facility			
			(e.g., fence or fence and cliff)?	XYes	No	—NA
			Describe tenel			
			Describe — tenet			
			AND			
		2.	Means to control entry through entrances (e.g.			
			attendant, television monitors, locked entrance			
			controlled roadway access)?	XYes	NO	—NA
	121	Ti-	Describe			
Gen	eral :	Insp	ection Requirements (264.15) (265.15)			
5.	Does	the	owner/operator maintain a written schedule at			
•			lity for inspecting:			
				V		
	a.	Mon	itoring equipment?	<u>≪</u> Yes	_No	NA
			ety and emergency equipment?	Yes	_	NA
	c.		urity devices:	<u> </u>		_
	d.	•	rating and structural equipment?	<u>X</u> Yes	No	NA
	e.	Тур	es of problems of equipment:			
		1.	Malfunction	Yes	No	NA
			Operator error	Yes	_	
			Discharges	Yes	_	_
			•	_		_
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
			Name of inspector?	XYes	No	
			Notation of observations?	<u>√</u> Yes	_	
			Date and nature of repairs or remedial	~		_
			action?	X Yes	No	NA
		5.	Identification of potential problems?	XYes		
	h	1.0	there any malfunctions or other deficiencies			
	D.	not	corrected? (Use narrative explanation sheet.)	Yes	No.	NA
	e:		descent (one introduction of the control of the con		4	7
	c.	Are	records kept a minimum of three years?	Yes	_No	_NA
Per	sonne	l Tr	<u>aining</u> (264.16) (265.16)			
7	Des-	485	owner/energy maintain negrouped training	,		
7.			owner/operator maintain personnel training at the facility?	Yes	No	NA
			11/15/66		.	_
	Date	of	most recent training:	_		
	•		· ·			

2.	Is the facility equipped with: (264.32) (265.32)	
	a. Internal communication or alarm system? YesNoNA	A
	1. Is it easily accessible in case of emergency? Yes _No _NA	A
	b. Telephone or two-way radio to call emergency response personnel? YesNoN	A
	c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? YesNoN	A
	d. Water of adequate volume of hoses, sprinkers, or water spray system? 1. Describe source of water	A
3.	Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35)(265.35) Yes No XNI	
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)	A
5.	In the case that more than one police or fire department might respond, is there a designated primary authority?YesNoNI (264.37) (265.37)	A
	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 No	A
	a. Are they really available to all personnel? Yes _No _N	A
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	A
8.	If State or local authorities declined to enter into agreements, is this entered in the operating record? (264.37) (265.37) Yes _No_NE	A

*

4.		owner/operator keep a written operating the facility? (264.73) (265.73)	Yes	No \(\sum_NA
	a. If ye	es, does it include:		
	1.	Description and quantity of each hazardous waste received?	Vee	No NA
	2.	Methods and dates of treatment, storage, and disposal?	Yes	
	, a 3.		Yes	
	. 4.	Cross-references to manifests/shipping papers?	Yes	No \ NA
	- 5.		Yes	_ ~
	6.		Yes	_ ~
	7.	Records and results of required inspections?	Yes	
	8.			- ~
		groundwater required by Subpart F?	Yes	No ANA
	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)?		_No KNA
	b. Does	facility have copy of permit on site?	Yes	NoNA
5.	Does the	facility submit a bionnial report by March 1	5	
	every ever	n-numbered year? (264.75) (265.75)	Yes	NoNA
	a. If y	es, do reports contain the following		
	info	rmation:		
	1.	EPA I.D. number?	Yes	NO NA
	2.	Date and year covered by report?	Yes	NoNA
	3.	Description/quantity of hazardous waste?	Yes	NoNA
	4.	Treatment, storage, and disposal methods?	Yes	NoNA
	5.	Monitoring data under Section 265.94(a)(2)	7	
		and (b)(2) (Part 265)?	Yes	NoNA
	6.	Most recent closure and post-closure cost estimates?	`	_No _NA
	7.	For TSD generators, description of efforts to reduce volume/toxicity of waste generated,		
		and actual comparisons with previous year?	Mes	No NA
	8.			_No _NA
6.		acility received any waste (that does not come	\	
		small generator exclusion) not accompanied		M ==
	by a mani	fest? (264.76) (265.76)	Yes	X No _NA
	a. If y	es, has he submitted an unmanifested waste		~ /
	reno	rt to the Executive Director?	Yes	No X NA

Part	

GENERATOR'S CHECKLIST

Sec	tion A	A - EPA Identification No.	
1.	Does	generator have EPA I.D. No.? (262.12)	Yes _No _NA
	a.	If yes, EPA I.D. No.	•
	*:		
Soc		2 - Manifort	
Sec	cion	3 - Manifest	- N - /
1.	Does	generator ship waste offsite? (262.20)	Xes _No _NA
	a.	If no, do not fill out Sections B and D.	
	b.	If yes, identify primary offiste 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)?	YesNoNA
*3		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) 5. a. Facility name, address, and EPA I.D. No.	Yes _No _NA
		 a. Facility name, address, and EPA I.D. No. b. Alternate facility name, address, and EPA 	Yes _No _NA
		I.D. No.	Yes No NA
		c. Instructions to return to generator if	4
		undeliverable	Yes No NA
		6. Waste information required by DOE - shipping	7
		name, quantity (weight or vol.), containers	<i>(</i>
		(type and number) 7. Emergency information (optional) (special	Yes _No _NA
		7. Emergency information (optional) (special handling instructions, telephone No.)	•
		8. Is the following certification on each	XYes _No _NA
		manifest form?	Yes _No _NA
		•	~~ · · ·

	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
	 If no, list wastes and quantities deemed nonhazardous or processes from which non- hazardous waste was produced (use additional sheet if necessary). 			
				
Sec	tion D - Pretransport Requirements			
1.	Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30)	Yes	ио	NA
2.	a. Are containers to be shipped leaking or corroding?b. Use sheet to describe containers and condition.c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31)	Yes		
3.	Does generator follow DOT labeling requirements in accordance with 49 CFR 172?	<u>√</u> 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: <u>HAZARDOUS WASTE</u> - Federal Law Prohibits Improper Disposal. If found, contact the nearest polic or public safety authority or the U.S. Environmental Protection Agency.	у		
	Generator name(s) and address(es)	_		
	Manifest document No.	_		
6.	Does generator have placards to offer to transporters? (262.33)	Yes	No	· NA

If equivalent test methods used, attach

Section F - Special Conditions

- 1. Has generator received from or transported to a foreign Administrator?
 Yes
 - _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_YNA
- 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)

releases?		Yes _	NO X NA
_	res, are the following components included in system:		,
1.		Yes _	No X NA
2.	- · · · · •	••	
3.	direction annually? (264.98(e)) Determination of statistically significant	xes _	_NO _\N#
٦.	increases over background concentrations at		
	each well? (264.98(f))	Yes	_N9/N
4.	If there was a statistically significant	300	7
	increase indicated, did the facility notify		\(\alpha\)
_	the Executive Director per 264.98(g)(1)? Did facility attempt to demonstrate an	—Yes —	_No/_N
5.	apparent increase was not caused by a regulate	ed	`
	unit per MHWMR 264.98(g)(6)?	Yes	No 🖍 N
6.	<u>-</u> -	s	_no
			- A
	operating record? Compliance Monitoring Program (264.99) facility operate a compliance monitoring		
		Yes	
Does the program?	Compliance Monitoring Program (264.99)		
Does the program?	Compliance Monitoring Program (264.99) facility operate a compliance monitoring yes, does the facility: Determine the groundwater flow rate and		
Does the program?	Compliance Monitoring Program (264.99) facility operate a compliance monitoring yes, does the facility: Determine the groundwater flow rate and direction in the uppermost aquifer annually?	Yes _	_no(<u>X</u> n
Does the program?	facility operate a compliance monitoring yes, does the facility: Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e))		_no(\(\frac{1}{2}\) n
Does the program?	facility operate a compliance monitoring yes, does the facility: Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e))	Yes _	_no_n
Does the program?	facility operate a compliance monitoring yes, does the facility: Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically	Yes _ Yes _	_no(\(\frac{1}{2}\) n
Does the program? a. If:	facility operate a compliance monitoring yes, does the facility: Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati	Yes _ Yes _	No No
Does the program? a. If: 1. 2. 3.	facility operate a compliance monitoring yes, does the facility: Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well?	Yes _ Yes _	_no_n _no_n
Does the program? a. If:	facility operate a compliance monitoring yes, does the facility: Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well? If an increase was indicated, did facility	Yes Yes Yes	No No
Does the program? a. If: 1. 2. 3.	facility operate a compliance monitoring yes, does the facility: Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well? If an increase was indicated, did facility notify the Executive Director?	Yes _ Yes _	No No
Does the program? a. If: 1. 2. 3.	facility operate a compliance monitoring yes, does the facility: Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well? If an increase was indicated, did facility notify the Executive Director?	_Yes _ _Yes _ _Yes _ _Yes _	No N
Does the program? a. If: 1. 2. 3.	facility operate a compliance monitoring yes, does the facility: Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well? If an increase was indicated, did facility notify the Executive Director? Analyze samples for constituents listed in Appendix IX of Part 264 at least annually?	Yes	No N

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

Yes No NA

decre two, sampl	downgradient wells in which a significant ase was detected? (Samples must be split in and analyses must be obtained of all additional es to determine whether the significant rence was a result of lab error) Yes No NA
ullie	rence was a result of lab error) YesNoNA
w.	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.	ii analyses confirmed significant increase / /
	(or pH decrease), did owner/operator submit to the Executive Director within 15 days after notification (discussed above) a certified
3.	groundwater quality assessment program? YesNoNA Did owner/operator implement the groundwater quality assessment program and, at a minimum,
	did he determine the following: YesNoNA
	a. Rate and extent of migration of the
	hazardous waste constituents in the
	groundwater? YesNoNA 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 ANA
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 If owner/operator determined that hazardous
0.	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 ground-
	water quality assessment plan was implemented
	prior to post-closure care, or cease to make
	determinations required in No. 3 above if ground-
	water quality assessment plan was implemented
_	during post-closure? Yes _No \(\sqrt{NA} \)
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,
990	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 postclosure?

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

	d. Expiration date of mechanism \arch	1997
2.	Is facility required to provide liability cover for non-sudden accidental occurrences?	A /
	a. Type of assurance Taxasa Tech	Yes _No _NA
	b. Is amount at least \$3 million per occurrer million annual aggregate?	Λ / ••
	c. Effective date of mechanism March 19	Q /a Yes _No _NA
	d. Expiration date of mechanism March	<u> </u>

CHCKLIST: 1r

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

96



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,

Bruce Ferguson

Hazardous Waste Division

Enclosure

cc:

Steve Ladner, Kerr-McGee

U. S. EPA, Region IV

FILE COPY

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

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. Pentachlorphenol 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 see 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**

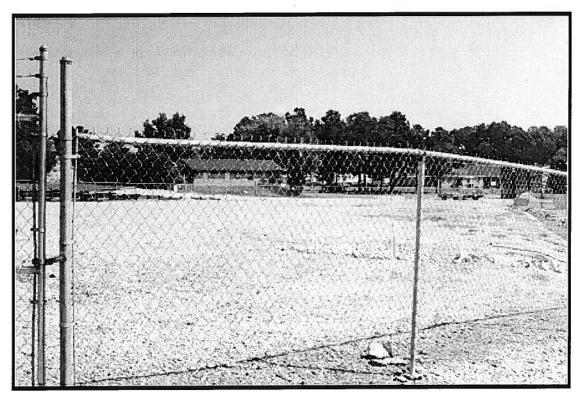
The facility was found to be in compliance with the applicable regulations and the Post-Closure permit.

11. Signatures

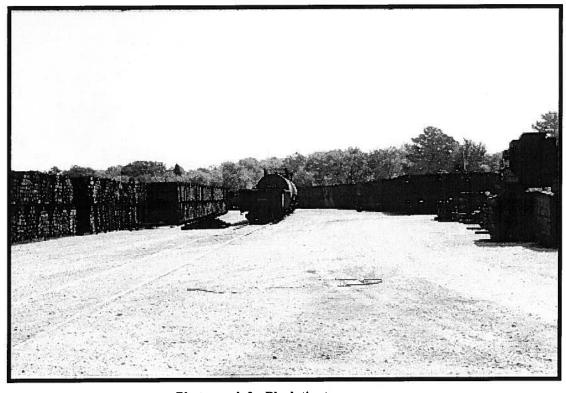
Bruce-Ferguson, Inspector

David Peacock, Supervisor

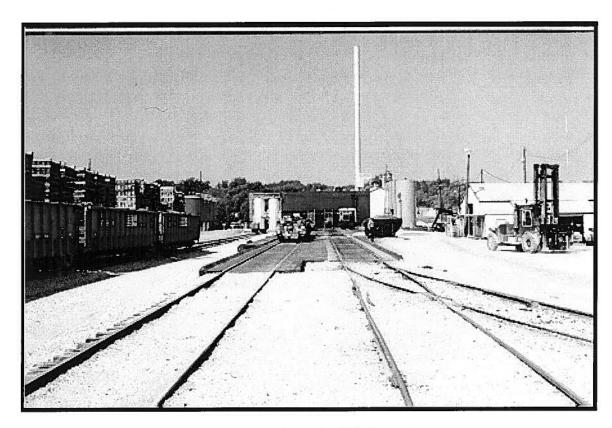
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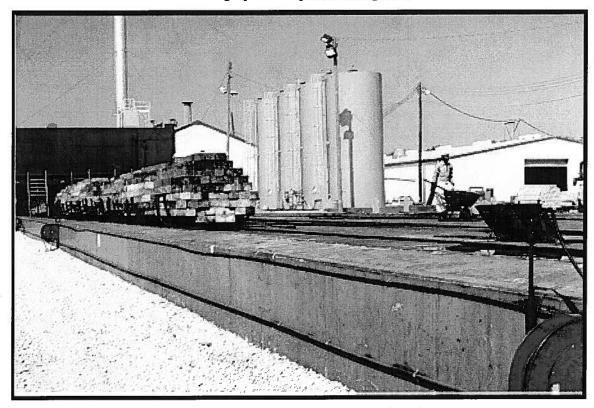
Photograph 1 - Closed surface impoundments.



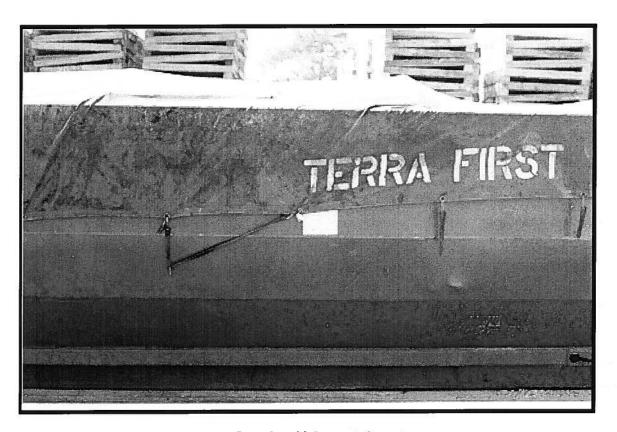
Photograph 2 - Black tie storage area.



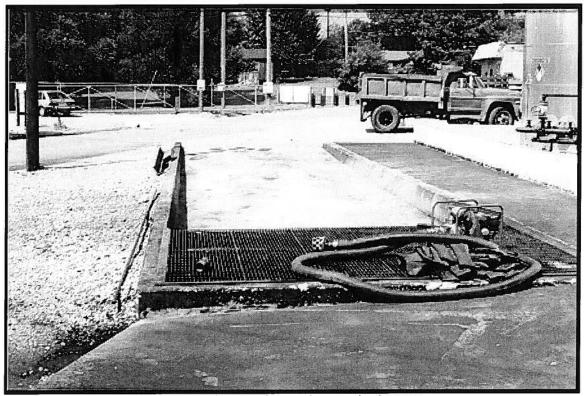
Photograph 3 - Drip track facing west.



Photograph 4 - Drip track facing northwest.



Photograph 5 - Less than 90 day container storage area.



Photograph 6 - Equipment decontamination area.

Part 1

	General Site Ini	- ; - /
Facility Name: Address:	Just-Melser Chemie	al Corperation
I.D. Number: Contact: Title: Phone Number:	Chiek Swann	
Type of Ownershi	.p:	·
Federal	StateCounty	MunicipalPrivate
	TransporterTrea	tmentStorage × Disposal
Regulatory Statu	18:	
Interim State	Part B	Submitted in Preparation
Principal Inspector Organization:	MDEC Pho	ne Number:
Inspection Parti	cipants:	
Chick Sugar	<u>Title</u>	Representing Kmc(
Buce Fergs	40 ~	MDEQ

P	art	

GENERAL FACILITY CHECKLIST

Sect	ion A	- General Facility Standards	
1.			\underline{X} Yes _No _NA
		f yes, EPA I.D. No	
2.	Has fa	cility received hazardous waste from a foreign ?	Yes XNO NA
	a. I	f yes, has it filed a notice with the Regional dministrator?	_yes _no $\underline{\chi}$ na
Was	te Anal	ysis	
3.	Does :	facility maintain a copy of the waste analysis at the facility?	Yes No NA
	a.	If yes, does it include: (264.13) (265.13)	
		 Parameters for which each waste will be analyzed? Test methods used to test for these 	Yes _No _NA
		parameters? 3. Sampling method used to obtain sample?	Yes _No _NA _Yes _No _NA
	_	 Sampling method used to obtain the sample. Frequency with which the initial analyses will be reviewed or repeated? 	Yes _No _NA
		5. (For offsite facilities) waste analyses that	XYes _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.b. Sampling method to be used to obtain	_Yes _No ANA
		representative sample of the waste to be identified.	_Yes _No ZNA
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

	b.	1.	Artificial or natural barrier around facility (e.g., fence or fence and cliff)?	XYes _No _NA
			Describe	
			Describe	*
			AND	
		2.	Means to control entry through entrances (e.g., attendant, television monitors, locked entrance	, 2
			attendant, television monitors, locate site	X Yes No NA
			controlled roadway access)?	
		či,	Describe	
Gene	eral	Insp	ection Requirements (264.15) (265.15)	
_		مطأ	owner/operator maintain a written schedule at	
5.	noer	faci	lity for inspecting:	
	CITE	1401		11 A
	a.	Mor	nitoring equipment?	Yes No NA
	b.	Sai	fety and emergency equipment?	Yes _No _NA
	c.	Sec	curity devices:	Yes No NA
	d.	Ope	erating and structural equipment?	Yes _No _NA
	е.	Туј	pes of problems of equipment:	
		1.	Malfunction	_Yes _No _NA
		2	. Operator error	_Yes _No _NA
			. Discharges	_Yes _No _NA
6.	Doe	s th	e owner/operator maintain an inspection log?	YesNoNA
	•			
	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?	XYes _No _NA
		5	. Identification of potential problems?	Yes _No _NA
			deficiencies	
	b.	. Ar nc	e there any malfunctions or other deficiencies of corrected? (Use narrative explanation sheet.) _Yes XNo _NA
	c	, Aı	re records kept a minimum of three years?	XAGE _NO _NY
Pe	rsoni	nel 1	<u>Graining</u> (264.16) (265.16)	•#
_		41	ne owner/operator maintain personnel training	^ /
7.	DO	28 CI	the the facility?	Yes No NA
	rec	pros	s at the facility?	
	Def	01	f most recent training:	80,

ı

	How long are they kept? Indiana	-
	a. If yes, do they include:	
	 Job title and written job description of each position? 	Yes No NA
	2. Description of type and amount of training?	YAS —NO —NY
	3. Records of training given to facility personnel?	Yes No NA
Req	uirements for Ignitable, Reactive, or Incompatible Waste (264.17) (265.17)	
	(264.17) (263.17)	
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?	9 1
	 If yes, use narrative explanation sheet to describe separation and confinement procedure If no, use narrative explanation sheet to describe sources of ignition or reaction. 	es.
	b. Are smoking and open flames confined to specifical designated locations?	_Yes _No _NA
	c. Are "No Smoking" signs posted in hazardous areas?	_Yes _No ANA
	d. Are precautions documented (Part 264 only)?	_Yes _No ANA
9.	Check containers	
	a. Are containers leaking or corroding?	Yes X_NoNA
	b. Is there evidence of heat generation from incompatible wastes?	Yes \(\frac{\sqrt{No}}{No} \)_NA
ं <u>Se</u>	ection B - Preparedness and Prevention	
1.	Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31)	YesNoNA
	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?
	c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? YesNoNA
	d. Water of adequate volume of hoses, sprinkers, or water spray system? 1. Describe source of water 1. there sufficient aisle space to allow unobstructed
3.	Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35)(265.35)YesNA
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)
5.	In the case that more than one police or fire department might respond, is there a designated primary authority?YesNoNA (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)
	a. Are they really available to all personnel? XYes 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) YesNoNA
8.	If State or local authorities declined to enter into agreements, is this entered in the operating record? (264.37) (265.37) YesNA

Section C - Contingency Plan and Emergency Procedures	at .
 Is a contingency plan maintained at the facility? (264.53) (265.53) 	Yes _No _NA
	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?	
3. List of all emergency equipment at facility and descriptions of equipment?	Yes No NA Yes No NA Yes No NA
4. Evacuation plan for facility personnel?	ALAGR —NO —NA
2. Is there an emergency coordinator on site or on call at all times? (264.55) (265.55)	
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?	YesNoNA
 Are the manifests signed and dated and returned to the generator? Is a signed copy given to the transporter? 	YesNoNA YesNoNA
 Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71) 	_Yes \(\sqrt{No _NA} \)
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?	YesNo XNA YesNo XNA
2. Is a signed copy given to the transporter?	_Yes _No KNA
3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72)	YesNo \(\sum_{NA} \)
a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter?	_Yes _No \(\sqrt{NA} \)
1. If no, has Regional Administrator been notified?	YesNo XNA

4. D	oes the owner/operator ecord at the facility?	keep a written operating (264.73) (265.73)	_Yes _No KNA
	a. If yes, does it in		
	1. Description a	and quantity of each hazardous	YesNo \NA
	waste receive	dates of treatment, storage, and	YesNo \(\sqrt{NA} \)
	3412	quantity of each hazardous waste	— 168 — 110 × 1111
	at each loca	tion?	_Yes _No ANA
	4. Cross-refere	nces to manifests/shipping	Yes No NA
	papers?	results of waste analyses?	Yes No NA
	5. Records and 6. Report of in	cidents involving implementation	
	a sha conti	ncency Dlan?	Yes No NA
		regults of required inspections;	-168 -W
	8. Monitoring,	testing, and analytical data, for required by Subpart F?	Yes No NA
	0 01 0 00 00 COST	estimates and, for disposar	<
	facilities,	post-closure cost estimates	_Yes _No

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

P	art	

GENERATOR'S CHECKLIST

Sec	tion A	- EPA Identification	<u>NO.</u>			
1.	Does	generator have EPA I.D	. No.? (262.12)	Yes	No N	ΙA
	a.	If yes, EPA I.D. No.				
	90	<u> </u>				
Sec	tion !	- Manifest		> /		
1.	Does	generator ship waste o	ffsite? (262.20)	Xes	NoN	IA
	a.	If no, do not fill out	Sections B and D.			
	b.	If yes, identify prima	ry offiste facility(s).			
2.	Does	generator use manifest	? (262.20)	Yes	NoN	IA
,	a.	If no, is generator a a generating between 100	small quantity generator 0 and 1000 kg/month)?	_Yes	_No _N	iA
		1. If yes, does generate to a	rator indicate this when a TSD facility?	Yes	NoN	iA
	b.	If yes, does manifest : information?	include the following	,		
		1. Manifest document	No.	Yes	NoN	IA
		2. Generator's name, number	mailing address, telephone	Xves		IA
		3. Generator EPA I.D.	. No.	Yes		ia Ia
		4. Transporter Name(s) and EPA I.D. No.(s)	∑Yes	_no _n	IA
		-	, address, and EPA I.D. No.	Yes	NoN	IA
		I.D. No.	ility name, address, and EPA	Yes	NoN	IA
		undeliverable	to return to generator if	Yes	NoN	IA
	*		required by DOE - shipping		_ _	
		(type and number)	eight or vol.), containers	Vee	No N	/ A
			tion (optional) (special	Yes	NoN	-
		handling instruct:	ions, telephone No.)	Yes	_No _N	A
			certification on each			
		manifest form?		XYes .	_No _N	A

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? 2	Yes _No _NA
If yes, complete a through e.	<i>J</i>
a. 1. Did generator sign and date all manifests? 2. Who signed for generator?	Yes _No _NA
Name Vana S Title	
 b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? 2. Who signed and dated for transporter? 	_YesNoNA
Name Vangy Title	
 c. Does generator retain one copy of manifest signed by generator and transporter? d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? e. Does generator retain copies for 3 years? 	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.)	
 Does generator solid waste(s) listed in Subpart C that exhibit hazadous 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)?	YesNoNA

	a. If equivalent test methods used, attach copy of equivalent methods used.	
3.	Are there any other solid wastes generated by generators?	YesNoNA
	a. If yes, did generator test all wastes to determine nonhazardous characteristics?	_Yes _No _NA
	 If no, list wastes and quantities deemed nonhazardous or processes from which non- hazardous waste was produced (use additional sheet if necessary). 	
	ction 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. c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31) 	
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: <u>HAZARDOUS WASTE</u> - Federal Law Prohibits Improper Disposal. If found, contact the nearest pol- or public safety authority or the U.S. Environmental Protection Agency.	icy
	Generator name(s) and address(es)	
	Manifest document No.	
6	 Does generator have placards to offer to transporters (262.33) 	? YesNoN

7. Accumulation time:	(262.34)		
before trans			Yes _No _NA
Also, f.	is each container ill out rest of No	. 7 (accum. time)	
b. 1. Does gen or corro	erator inspect con sion? (265.174 -	tainers for leaka Inspections)	geNoNA
2. If yes,	with what frequenc	.Y.?	wells
or reactive the facility Requirements	or locate containe waste at least 15 's property line? s for Ignitable or	(265.176 - Speci Reactive Wastes)	.al ,
NOTE: If tanks are	•		
d. Are the cont with Section	tainers labeled and D-9	i marked in accord 5 of this form?	Yes _No _NA
NOTE: If generator a checklist for	accumulates waste of General Facilitie	on site, fill out s, Subparts C and	D.
e. Does genera personnel t Personnel T	tor comply with re raining? (Attach raining.)	quirements for checklist for 265	.16 - Yes _No _NA
8. Describe storage explanation shee	area. Use photos t.	and narrative	
Section E - Recordke	eping and Records	(262.40)	
1. Does generator	ceep the following	reports for 3 year	ars?
. Wanifagts	and signed copies	from	Yes _No _NA
b. Biennial Re	ports		Ŷes _No _NA
c. Exception	reports		Yes _No _NA
d. Test result	ts		YesNoNA
2. Where are the re	ecords kept (at fa	cility or elsewher	re)?
3. Who is in charge	e of keeping the r	ecords?	
Name Chick	Suam	Title	

Section F - Special Conditions

1. Has generator received from or transported to a foreign _Yes No _NA Administrator? If yes, has he filed a notice with the Regional Administrator? _Yes _Nob. Is this waste manifested and signed by a foreign

Yes __No

cosignee? c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? __Yes __No/

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
Lelegbert	— — *
a. If yes, are the following components included in the system:	
cue alacem.	\sim
1. Background values?	_Yes _No _NA
2. Determination of groundwater flow rate and	
direction annually? (264.98(e))	_Yes _No TNA
3. Determination of statistically significant	1
increases over background concentrations at	A
each well? (264.98(f))	_Yes _No INA
4. If there was a statistically significant	1
increase indicated, did the facility notify	_Yes _No NA
the Executive Director per 264.98(g)(1)?	${\text{res}}$ ${\text{ud}}$ \neq_{uv}
5. Did facility attempt to demonstrate an	, ad
apparent increase was not caused by a regular	Yes No ANA
unit per maker 204.90(y)(0).	's
unit per MHWMR 264.98(g)(6)? 6. Is all information contained in the facility operating record?	Yes No NA
opolating letters.	
Section D - Compliance Monitoring Program (264.99) 1. Does the facility operate a compliance monitoring program?	_Yes _NoX_NA
a. If yes, does the facility:	Ø 61
1. Determine the groundwater flow rate and	
direction in the uppermost aquifer annually?	1
(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 contaminat	YOU NOW NA
at each monitoring well? 4. If an increase was indicated, did facility	_Yes _NoX NA
notify the Executive Director?	_Yes _No NA
5. Analyze samples for constituents listed in	- \
Appendix IX of Part 264 at least annually?	_Yes _No KNA
6. Record all information in the operating	- XXX
record?	Yes No NA
·	•
Section E - Corrective Action Program (Part 264 only) (2	264.100)
1. Does facility follow a corrective action program that	Yes No NA
meets the facility's permit requirements?	7-102 -us -us

Section F - Sampling and Analysis (Part 265)

Section F - Sampling and Analysis	
	Yes _No _NA
1. Has the facility developed and rossess	Yes _No _NA
sampling and analysis plan?	
include procedures and	
a. If yes, does the plan include procedures and	
techniques for:	A
	YesNoNA YesNoNA YesNoNA YesNoNA
1. Sample collection?	Yes No NA
Cample Dreservation:	Yes No NA
a analytical procedure.	Yes No NA
4. Chain-of-custody control?	<u> </u>
4. Olivan	
2. Has the owner/operator established initial background	
 Has the owner/operator established initial bedget concentrations or values of all parameters specified in concentrations or values of all parameters 	Yes No NA
concentrations of the	— ** — ·
265.92(b)?	9
a. Samples collected to establish background quality	Yes No NA
a. Samples collected to	
(from above)? b. Samples collected to indicate contamination (from	M NA
b. Samples collected to instant	YesNONA
above)? c. Elevation of groundwater surface at each monitor	ing
c. Elevation of groundwater the	YesNoNA
c. Elevation of granding event? well at each sampling event?	
	1255 021
Section G - Preparation, Evaluation, and Response (Part 2	265 only) (265.93)
Section G - Preparation, Evaluation, una	
1. Did owner/operator prepare an outline of a groundwate	er /
1. Did owner/operator prepare an outring of	_Yes _No KNA
1. Did Owner/Operator ? quality assessment program?	
the following:	
a. If yes, did program determine the following:	Γ
1. Whether hazardous waste or hazardous waste	/
1. Whether hazardous waste of hazardwater?	YesNo /_NA
1. Whether hazardous waste of the groundwater?	
constituents have entored waste or 2. Rate and extent of hazardous waste or	_Yes _No _NA
	-doug (
one of hazardous waste of	_Yes _No _NA
3. Concentrations of management 3. waste constituents in groundwater?	&
	he
b. For each well, has owner/operator calculated to	nlicate
b. For each well, has owner/operator tareased on four repartments mean and variance, based on four repartments are the sample, and compared the	
	Yes No NA
with initial background mean?	Yes _No NA
MTCII Trianger	
c. Has owner/operator submitted information docum	Yes _No_NA
· - : Figant Inclease	Yes No NA
any significant into decrease in pH)?	
	_
d. If the comparisons for downgradient wells show	/ a
d. If the comparisons for downgradient well and the significant increase (or pH decrease), has the significant increase (or pH decrease).	owner/
significant increase (or ph decrease), the operator obtained additional groundwater sample operator obtained additional groundwater obtained a	les from
operator obtained addition	

hose	downgradient wells in which a significant		. 150
lecre	ase was detected? (Samples must be split in		
- WO -	and analyses must be obtained of all additional		_
lomas	es to determine whether the significant		/
liffe	rence was a result of lab error)	_Yes _	_No ANA
			/ \
1.	If analyses (described above) were performed,		`
1.	and confirmed the significant increase (or pH		
	decrease), did owner/operator notify Regional		
	decrease), did Owner/Operator Hours	Yes	_no _na
	Administrator within 7 days?		
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		6
	groundwater quality assessment program?	Yes	_No/_NA
2	Did owner/operator implement the groundwater		' (
3.	quality assessment program and, at a minimum,		
	did he determine the following:	Yes	_No ANA
	GIO HE GEFERMINE CHE FATTAMENT.		_ /
	and automb of migration of the		•
	a. Rate and extent of migration of the		Λ
	hazardous waste constituents in the	Voc	No NA
	groundwater?	Yes	_No NA
	b. Concentrations of the hazardous waste	**	No o ANA
	in the groundwater?	Yes	-no/X-mx
	∌ •		
4.	Did owner/operator submit a report to the		
••	Procutive Director containing the requests of		
	the assessment outlined in No. 3 above within		χ
	15 days?	Yes	_No ANA
5.	Did owner/operator notify the Executive		•
3.	Director of reinstatement of indicator		
	evaluation program upon finding that no		
	hazardous waste or hazardous waste constituent	:s	ſ
	had entered the groundwater?	Yes	No/ NA
	If owner/operator determined that hazardous		— V
6.	If owner/operator determined that intractors		36.0
	waste or hazardous waste constituents entered	-	
	the groundwater, did he either continue to make the groundwater, did he either continue to make the groundwater.		
	the determinations listed in No. 3 above on a	_	
	quarterly basis until final closure or ground-	_	
	water quality assessment plan was implemented		
	prior to post-closure care, or cease to make		
	determinations required in No. 3 above if grow	und-	
	water quality assessment plan was implemented		
	during post-closure?	Yes	_NoWNA
7	If any groundwater quality assessment program	-	~
, .	is implemented to satisfy No. 3 above prior to	0	
	final closure, has owner/operator completed		
•	program and reported to the Executive Director	r,	1
	as outlined in No. 4 above?	Yes	_NO NA
_	we won to a least		- *
8.	II owner/operator does not monitor at reast		
	annually to satisfy No. 3 above, does owner/	05	
	operator evaluate data on groundwater elevati	OII o	

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

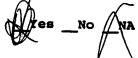
_Yes _No √NA

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

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:

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?

d

3. (Annually) does owner/operator report concentrations or values of parameters listed in Section 265.92(b)(3) for each well, including required evaluationg for these parameters under Section 265.93(b)?

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

- 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 postclosure?

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

Sec	ction A - Closure	
1.	Is facility required to provide financial assurance for closure?	NA
	a. Type of financial assurance	
	b. Amount of closure costs	
	1. Date of most recent adjustment	
	c. Effective date of mechanism	
	d Projection date of mechanism	
	e. Is instrument adequate? Yes _No	AM c
Sec	ection B - Post-Closure	
_	. Is facility required to provide financial assurance	
1.	for post-closure care? Yes _N	o NA
	a. Type of financial assurance Translation Test	_
	mmo of financial assurance Financial lest	
	1 Date of most recent adjustment March 1980	
	c. Effective date of mechanism Merch 1994.	
	d Expiration date of mechanism March (4)	
	e. Is instrument adequate? Yes _N	oNA
	6. 19 1	
<u>Se</u>	ection C - Corrective Action	
1.	. Is facility required to provide financial assurance for	
1.	corrective action?	oNA
	1 ,	
	a. Type of financial assurance Financial Test	
	1 Date of most recent adjustment Mach 1966	
	c. Effective date of mechanism March 1894	
	d. Expiration date of mechanism Wacel 199	
	e. Is instrument adequate? Yes _!	ioNA
Se	Section D - Liability Requirements	
1.	l. Is facility required to provide liability coverage for	
	sudden accidental occurrences?	NO _NA
	Test	
	a. Type of assurance Figure occurrence. \$2	
	b. Is amount at least \$1 million per desarrance, to	#.
	million annual aggregate?	MANA
	c. Effective date of mechanism	

	d.	Expiration date of mechanism March 1997	
2.		acility required to provide liability coverage	V
	for	non-sudden accidental occurrences?	Yes _No _NA
	a.	Type of assurance I-veneral Test	, ,
	b.	Is amount at least \$3 million per occurrence, \$6	. /
		million annual aggregate?	Yes _No _NA
	c.	FILECTIVE date of mecuanism 1000 600 1114	s
	d.	Expiration date of mechanism March 1997	

CHCKLIST: 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 dirippage 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

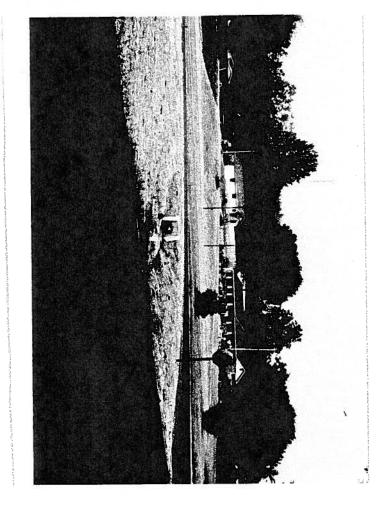
No apparent violations were found on the day of the inspection. The following comments were, however, compiled as a result of the inspection:

- 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.

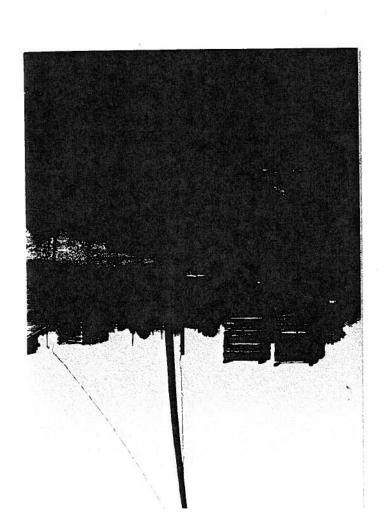
11. Signatures

Bruce Ferguson, Inspector

David Peacock, Supervisor

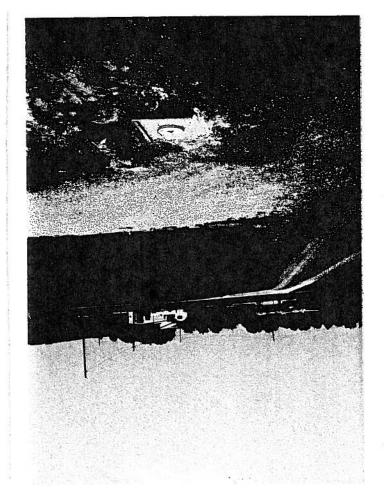


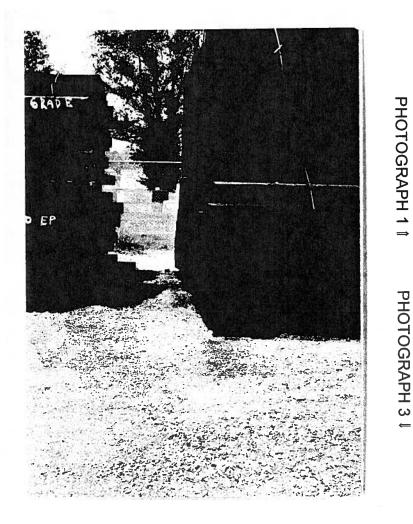
PHOTOGRAPH 11 ↑

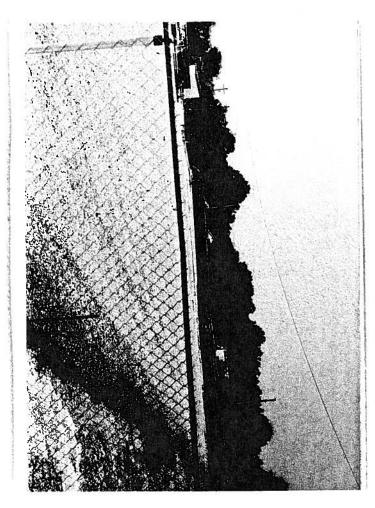


PHOTOGRAPH 9 1

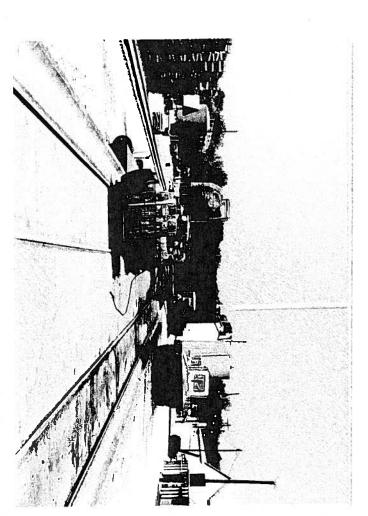




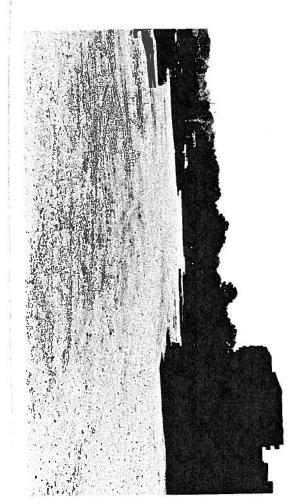


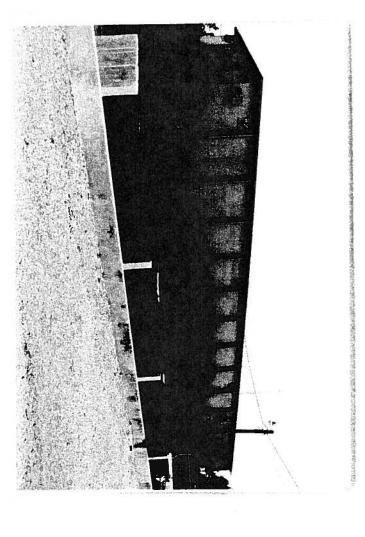


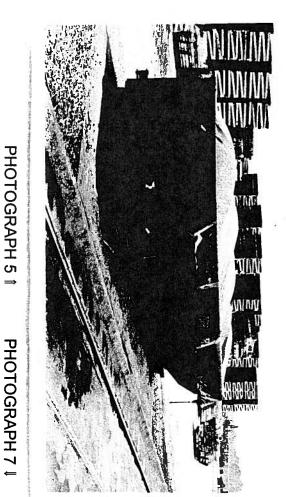
PHOTOGRAPH 3 ↓



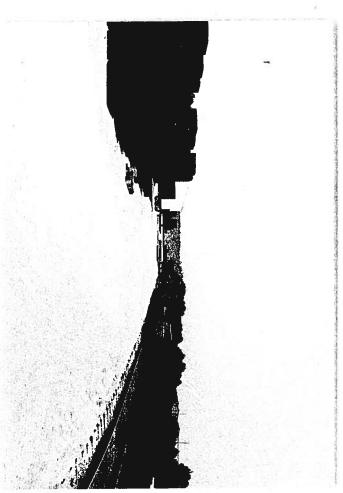






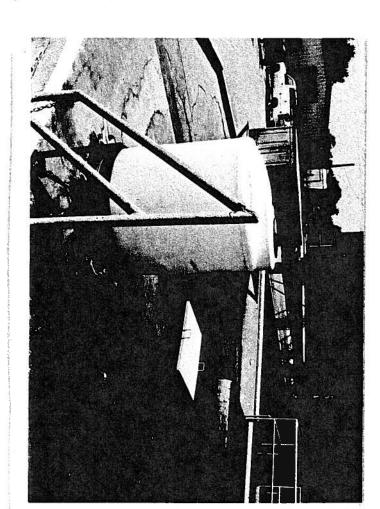


PHOTOGRAPH 7 I



PHOTOGRAPH 6 1

PHOTOGRAPH 8 |



Appendix IV

Inspection Checklists

CHE	CKLISTS	
1.	General Site Inspection Information Form	
2.	General Facility Checklist	
3.	Air Emissions Checklist	
4.	Containers Checklist	
5.	Generators Checklist	
6.	Ground-Water Monitoring Checklist	
7.	Health & Safety Checklist	
8.	Incinerator Checklist	
9.	Land Disposal Restrictions Checklist	
10.	Landfills Checklist	
11.	Land Treatment Checklist	
12.	Surface Impoundments Checklist	
13.	Thermal Treatment Checklist	
14.	Transporters Checklist	
15.	Waste Information Checklist	
16.	Waste Piles Checklist IV-140	

51	1. General Site I	nspectio	on Informatio	n Form	
	KERR-Melsee CHEMICAL CORPE	RATIO	2360 (4 ⁷	HAve + 20	5 5t. N'
Α.	SITE NAME		STREET (or o		
	CITY D. STATE		39701	Low	nder
C.	CITY D. STATE	E.	ZIP CODE	F. COUNT	Y NAME
G. 1.	SITE OPERATOR INFORMATION Name Kerr. Melsec Chemical Corp		·	2. Tel	ephone Number
3.	Street 14th Arca 20th 5+ ~ Columnia Col	mbus	5. State	>	6. Zip Code 39つの)
7.	Facility Contact/Telephone No.		8. Respon	nsible Official/	Telephone No.
H.	SITE DESCRIPTION				
	TYPE OF OWNERSHIP 1. Federal 2. State FUNCTION				
*	1. Generator 2. Transporter	3. 1	Treatment	4. Storage 🔬	5. Disposal
K.	REGULATORY STATUS 1. Interim Status	3.	Part B Permit	Application Sub	mitted
_	2. Permitted Facility	4.	Part B Permit	Application in 1	Preparation
L. 1.	INSPECTOR INFORMATION Principal Inspector Name	3.	Organization		
	bruce Ferguson	•	MS D	56	
2.	Title EE II	4.		(area code and	d No.)
M.	INSPECTION PARTICIPANTS				
	1	6		· · · · · · · · · · · · · · · · · · ·	
	2.	7			
	<u>3.</u>	8	<u> </u>		
	5.	<u>9.</u>		84	

		2. General Facility Checklist		
Secti	on A - General	Facility Standards (40 CFR 264/5 Subpart B)	Yes	No
1.	a. If yes,	have EPA Identification No.? (\$\$264/5.11) EPALD. NoMSD &>>> B(do322) explain	X	
2.	(§§264/5.12)	received hazardous waste from a foreign source? filed a notice with the Regional Administrator?	_	X
Was	te Analysis			
3.	Does facility on-site? (§§2	maintain a copy of the waste analysis plan 64/5.13)	<u></u>	_
	 a. If ye 1. 2. 3. 4. 5. 6. 	Parameters for which each waste will be analyzed? (§§264/5.13(b)(1)) Test methods used to test for these parameters? (§§264/5.13(b)(2)) Sampling method used to obtain sample? (§§264/5.13(b)(3)) Frequency with which the initial analyses will be reviewed or repeated? (§§264/5.13(b)(4)) (For off-site facilities) waste analyses that generators have agreed to supply? (§§264/5.13(b)(5)) (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.		

4 .		the facility provide adequate security through: 4/5.14)	Yes	No
	a.	24-hour surveillance system (e.g., television monitoring or guards)?	23	_
	OR		,	
	b.	1. Artificial or natural confining barrier around facility (e.g., fence or fence and cliff)? (§§264/5.14(b)) Describe:	*	_
		AND	Š	
		Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? (§§264/5.14(b)(2)(ii))	7	ά.
		Describe:		
Gene	eral Insp	pection Requirements		
5.		the owner/operator maintain a written schedule at the ty for inspecting: (§§264/5.15)		
	a. b.	Monitoring equipment? Safety and emergency equipment? (§§264/5.15(b))	_	_
	c. d. e.	Security devices: Operating and structural equipment? Types of problems with equipment:		_
		 Malfunction (§§264/5.15(a)) Operator error Discharges 	=	_
6.		the owner/operator maintain an inspection log? 64/5.15(d))	g - <u></u>	
	a.	If yes, does it include:		
	я	 Date and time of inspection? Name of inspector? Notation of observations? 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))		

Pers	Personnel Training				
7.	the f	the owner/operator maintain personnel training records at facility? (§§264/5.16)	Å	_	
	a.	If yes, do they include:			
Requ	uiremen	 Job title and written job description of each position? (§§264/5.16(d)) Description of type and amount of training? Records of training given to facility personnel? 	X	=	
8.		s facility handle ignitable or reactive wastes? (§§264/5.17)		X	
	а.	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. c. d.	Are smoking and open flame confined to specifically designated locations? Are "No Smoking" signs posted in hazardous areas? Are precautions documented (Part 264 only)? (§264.17(c))	=	=	
9.	Are	containers leaking or corroding? (§§264/5.171)		_	
10.	Is th	nere evidence of heat generation from incompatible wastes?			
Secti	ion B - F	Preparedness and Prevention (40 CFR 284/5 Subpart C)			
1.		nere evidence of fire, explosion, or contamination of the ironment?		\angle	
	If ye	es, use narrative explanation sheet to explain.			
2.	Is th	ne facility equipped with: (§§264/5.32)			
	a.	Internal communication or alarm system?	\times	_	
		(i) Is it easily accessible in case of emergency? (§§264/5.34)	X	_	

	b.		phone or two-way radio to call emergency response onnel? (§§264/5.32(b))	Yes	No
	c.	Port	able fire extinguishers, fire control equipment, spill rol equipment, and decontamination equipment? 64/5.32(c))	X	_
	d.	Wate spray	er of adequate volume for hoses, sprinklers, or water y system? (§§264/5.32(d))	上	_
3.			icient aisle space to allow unobstructed movement of nd equipment? (§§264/5.35)	7	©
4.	auth (Lay- associ norm	orities to out of faciated health	ner/operator made arrangements with the local to familiarize them with characteristics of the facility? acility, properties of hazardous waste handled and azards, places where facility personnel would working, entrances to roads inside facility, possible routes.) (§§264/5.37)	7	_
5.	respo	ond, is t 54/5.37(hat more than one police or fire department might here a designated primary authority? a)(2)) s, name primary authority:	4/6	` _
6.	with	State e	ner/operator have phone numbers of and agreements mergency response teams, emergency response and equipment suppliers? (§§264/5.37(a)(3))	4	
	a.	Are 1	they readily available to all personnel?		_
7.	with injur	the propies	ner/operator arranged to familiarize local hospitals perties of hazardous waste handled and types of could result from fires, explosions, or releases at the 264/5.37(a)(4))	<u>X</u>	
8.	calle (§§26	d for un 84/5.37()		<u>~</u>	<u> </u>
	<u>ion C - C</u> FR 264/		ency Plan and Emergency Procedures	fis.	
1.			ency plan maintained at the facility? (§§264/5.51)	7	
	a.	If yes	s, is it a revised SPCC Plan? (§§264/5.52(b))	$\overline{\mathcal{X}}$	
	b.	Does	contingency plan include:	•	
		1.	Arrangements with local emergency response organizations? (§§264/5.52(c))	K	
		2.	Emergency coordinator's names, phone numbers, and addresses? (§§264/5.52(d))	7	
		3.	List of all emergency equipment at facility and descriptions of equipment? (§§264/5.52(e))	æ	
		4.	Evacuation plan for facility personnel? (§§264/5.52(f))	<u> </u>	_

2.	Is the (§§26-	ere an er 4/5.55)	mergency coordinator on site or on call at all times?	Yes	No
Section (40 C	on D - M FR 264/5	lanifest Subpar	System. Recordkeeping, and Reporting t E)		. /
1.	Does	facility	receive waste from off-site? (§§264/5.71(a))		×
	a.		, does the owner/operator retain copies of all fests?		
		1. 2.	Are the manifests signed and dated and returned to the generator? Is a signed copy given to the transporter?		
2.	Does ship	the faci ment) tr	ility receive any waste from a rail or water (bulk ansporter? (§§264/5.71(b))		X
	a.	If yes	s, is it accompanied by a shipping paper?		
		1. 2.	Does the owner/operator sign and date the shipping paper and return a copy to the generator? Is a signed copy given to the transporter?	_	
3.	inco	the own nsistent 64/5.72)	er/operator received any shipments of waste that were with the manifest (manifest discrepancies)?		X
	a.	If ye	s, has he attempted to reconcile the discrepancy with generator and transporter?	_	
	•	1.	If no, has Regional Administrator been notified?		
4.	Doe:	s the ow lity? (§§	ner/operator keep a written operating record at the 264/5.73(a))	\angle	

	a.	If yes	, does it include: (§§264/5.73(b))	Yes	No
(55)		1.	Description and quantity of each hazardous waste received?	<u>«</u>	
		2.	Methods and dates of treatment, storage, and disposal?	<u>~</u>	
		3.	Location and quantity of each hazardous waste at each location?	<u>N</u>	
		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 or testing analytical data? (Part 264)		
	5)	9.	Closure cost estimates and, for disposal facilities, post-closure cost estimates? (Part 264)	•	
		10.	Notices of generators as specified? (§264.12(b))		
		11.	Certification of permittee waste minimization program? (§264.73(b)(9))		
		12 .	Land disposal restriction records required by		
			§268.5, §268.6, §268.7(a), and §268.8, as applicable? (§264.73(b)(10)-(16))		
5.	Does	the facili	ty submit a biennial report by March 1 every even-		
	numl	pered yea	r? (§§264/5.75)	\propto	
	a.	If yes,	do reports contain the following information:		
		1.	EPA I.D. number? (§§264/5.75(a))	\checkmark	
		2.	Date and year covered by report? (§§264/5.75(b))		
		3.	Description/quantity of hazardous waste? (§§264/5.75(d))	~ ~	
		4.	Treatment, storage, and disposal methods? (§§264/5.75(e))	Δ.	
		5.	Monitoring data under §265.94(a)(2) and (b)(2)? (§265.75(f))	<u> </u>	_
		6.	Most recent closure and post-closure cost estimates? (§§264/5.75(g))	1	
		7.	For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual		
		8.	comparisons with previous year? (§§264/5.75(h)) Certification signed by owner/operator?	A	
		0.	(§§264/5.75(j))	4	
6.	Has tl	he facility	received any waste (that does not come under the	•	
	small (§§264	generato	r exclusion) not accompanied by a manifest?		\$

a. If yes, has he submitted an unmanifested waste report to the Yes No 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)

		3. Air Emissions Checklist		
Seci	ton A -	Applicability (\$8284/5.1030)	Yes	No
1.		s the facility have units permitted under Part 270 or is it nitted 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?		·
Sent	ion R - V	Waste Streams		
CACCI	OH II-	HASIE SITERING		
3.	Are	there waste streams associated with any separation processes		
	that	contain 10 ppmw or greater organic concentration?		
	(§§2	64/5.1032(a))		
(0)				
	a.	If they claim waste streams below 10 ppmw, did they use		
		proper means to determine concentration?		
		(§§264/5.1084(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))		
Secti	on C-	Facility Emissions Rates		
	1			
4.	equa	e/hourly process vent organic emission rate greater than or 1 to 3 lb/hr? (§§264/5.1032(a))		
	To Ah			
	equa	e yearly process vent organic emission rate greater than or lto 3.1 tons/yr? (§§264/5.1032(a))	\	
	/	· · · · · · · · · · · · · · · · · · ·		
	/		//	
	/		//	
	•			
/			1	
/				

==0	4. Containers Checklist		
Sect	ion A - Use and Management (§§264/5.171)	Yes	No
1.	Are containers in good condition?	$ \angle $	
Sect	ion 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?	K	
Sect	ion C - Management of Containers (§§264/5.173)		
1. 2.	Is container always closed while holding hazardous waste? Is container not opened, handled, or stored in a manner which may rupture it or cause it to leak?	<u>×</u>	$\overline{\underline{\mathcal{X}}}$
Sect	ion D - Inspections (§§264/5.174)		
1.	Does owner/operator inspect containers at least weekly for leaks and deterioration?	7_	 .
Sect	ion E - Containment (§264.175)		`
1.	Do container storage areas have a containment system?	N	-
Sect	ion F - Ignitable and Reactive Waste (§§264/5,176)	1	
1.	Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines?	<u> </u>	<u>+</u>
Sect	ion G - Incompatible Waste (§§264/5.177)		
1.	Are incompatible wastes or materials placed in the same containers?		\times
2.	Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?	*	\propto
3.	Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?	_//	<u>-</u>
Sect	ion H - Closure (§264.178)		1
1.	At closure, were all hazardous wastes and associated residues removed from the containment system?	<u>~/</u> ,	/ <u>A</u>

			5. Generators Checklist		
Secti	on A - I	EPA Ide	entification No.	Yes	No
1.	Does	genera	tor have EPA I.D. No.? (§262.12)	\swarrow	
	a.	Ifyes	, EPALD. No		
Secti	on B - N	/Ianifes		,	
1.	Does	genera	tor ship waste off-site? (§262.20)	$\overline{\mathcal{X}}$	9
	a. b.	If ye	s, do not fill out Sections B and D. s, identify primary off-site facility(s). Use narrative anation sheet.	4	
2.	Does	genera	tor use manifest? (§262.20)	<u>K</u>	
	а.		e, is generator a small quantity generator (generating een 100 and 1000 kg/month?		±.
NOT	E:		s are only exempt if wastes are reclaimed. (See .20(e).)		
		1.	If yes, does generator indicate this when sending waste to a TSD facility?	4	

b.		s, does manifest include the following information? 262 appendix)	Yes	No
			X	
	1.	Manifest document no.	-	
	2.	Generator's name, mailing address, telephone no.		
	3.	Generator EPA I.D. no.	2	
	4.	Transporter Name(s) and EPA I.D. no:(s)	XXXX	
	5.	a. Facility name, address, and EPA I.D. no.	<u> </u>	_
		b. Alternate facility name, address, and EPA		
		I.D. no.	~	
		c. Instructions to return to generator if	1	
		undeliverable	-	
	6.	Waste information required by DOE - shipping		
		name, quantity (weight or vol.), containers (type	_	
		and number)	<u>~</u>	
	7.	Emergency information (optional)	•	
		(special handling instructions, telephone no.)	-X -	
	8.	Is the following certification on each manifest		
		form?	7	19.
		"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."		
		¥	\swarrow	5
	9.	Does generator retain copies of manifests?	~	

If yes, complete a through e. (§262.23)

(§262.40)

s		a.	1. 2.	Did generator sign and date all manifests? Who signed for generator?	* (Sec)	Yes	No —
		Name		Title			
		b.	1.	Did generator obtain handwritten signature and date of acceptance from initial transporter?		F	
			2.	Who signed and dated for transporter? (§262.23)			
		Name		Title			
		c.	signe	generator retain one copy of manifest ed by generator and initial sporter? (§262.40)		M_	
		d.	Do r	eturned copies of manifest include ity owner/operator signature and date		V -	=
		e.	of ac	ceptance? (§262.40) generator retain copies for 3 years?		XX X	
Secti	on C - I	Hazardous Was	te Deter	mination (40 CFR 262.11)			
1.		generator generator generatous Waste)?		id waste(s) listed in Subpart D (List of			
	a.	If yes, list w Waste No.)	astes ar	nd quantities (include EPA Hazardous			
2.	exhil		haracte	id waste(s) listed in Subpart C that ristics (corrosivity, ignitability,	14		
	a.	If yes, list w Waste No.)	astes ar	nd quantities (include EPA Hazardous			
*	b.	Does genera		rmine characteristics by testing or by			

36		Yes	No
	 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?		
	 If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary) 		
			9
Sect	ion D - Pretransport Requirements		
1.	Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (§262.30)	K	
2.	 a. Are containers to be shipped leaking or corroding? b. Use additional sheet to describe containers and condition. c. Is there evidence of heat generation from incompatible wastes in the containers? 		× ×
3.	Does generator follow DOT labeling requirements in accordance with 49 CFR 172? (§262.31)	\swarrow	
4.	Does generator mark each package in accordance with 49 CFR 172? (§262.32)	$\overline{\alpha}$	4
5.	Is each container of 110 gallons or less marked with the following label? (§262.32)	tool of	\leq
	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)		

7.	Accumi	ulation time (§262.34)	Yes	No
	a.	Are containers used to temporarily store waste before transport?		V
		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)		:(40
		2. If yes, with what frequency?		
	с.	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)	7	_
NOTE	i :	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.		
120	e.	Does generator comply with requirements for personnel training? (Attach checklist for §265.16 - Personnel Training.)	X	
8.	Describ	be storage area. Use photos and narrative explanation	,	
Section	n E - Rec	cordkeeping and Records (40 CFR 262.40)	3	
1.	Does g	enerator keep the following reports for 3 years?		
75	a. b. c. d.	Manifest or signed copies from designated facilities Biennial reports Exception reports Test results	1981A8	
2.	Where	are the records kept (at facility or elsewhere)?		
3.	Who is	s in charge of keeping the records?		
Name_	(hu	the Tribe		

Section F - Special Conditions

1.	Has sour	the primary exporter received from or transported to a foreign ce any hazardous waste?	Yes No
	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)	

6. Ground-Water Monitoring Checklist

Section	nA-M	onitoring System (40 CFR Parts 264/5 Subpart F)	Yes	No
1.		the facility have a ground-water monitoring system in tion? (§265.90)	X	
	a.	If yes, does the system consist of: (§265.91)		
		 Minimally one upgradient monitoring well? (Part 265) Minimally three downgradient monitoring wells? 	X	
		(Part 265)	$\overline{\wedge}$	
	b.	Are monitoring wells cased so that the integrity of the boreholes is maintained? (§265.91)	$\overline{\mathcal{M}}$	_
	c.	Is a compliance monitoring system installed whenever hazardous waste constituents are detected at the compliance point? (§264.92)	1	
	d.	Is a corrective-action program initiated whenever the ground-water protection standard is exceeded? (§264.100(c))	2	
	e.	Is a detection monitoring program instituted in all other cases? (§264.98)	V	
2.	Does to (Part 2	he facility have a monitoring and response program?		
	a.	If yes, is a compliance monitoring system instituted whenever hazardous constituents are detected at the compliance point? (§264.99)	7	
	b.	Whenever the ground-water protection standard is exceeded, does facility institute a corrective-action program? (§264.99)	+	_
	c.	In all other cases, does the facility institute a detection monitoring program? (§264.99)	1	
Section	n B - Sa	mpling and Analysis (40 CFR 265.92)		
1.	Does the	he facility obtain and analyze samples from the ground- monitoring system? (§265.92(a))	1	
2.	Has fa and an	cility developed and followed a ground-water sampling alysis plan? (§265.92(a))	4	_

Secti	on E - G	eneral Requirements	Yes	No
1.	Does (§264	facility comply with the following requirements?		5
	a.	Are sufficient wells installed at appropriate locations and	X	7 3
	b.	depths? Have sampling and analysis techniques been consistent?	***	
	c. d.	Have ground-water elevation data been recorded? Have background concentrations been determined?	X	
2.	If gro (4), c	ound water is monitored to satisfy requirements of §265.93(d) 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.	\angle	
	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)?) (m)	
		4. Did owner/operator also separately identity 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	u	
Sec	tion F •	year? Detection Monitoring Program (40 CFR 264.98)		
1.	Нас	s owner/operator established detection monitoring system to vide reliable indications for detection releases?	K	0
	a.	If yes, are the following components included in the system:		

			I ØS	14.0
		1. Background values? /	XX 1	
		2. Determination of ground water flow rate?		_
		3. Determination of ground-water compliance point		
		semiannually? / X	ANI L	
		4. Determination of statistically significant		
		increases over background concentrations?	HINT,	
		5. Notification to the Regional Administrator if there		
		was a statistically significant increase?	<u>kr</u>	
Section	on G - Co	ompliance Monitoring Program (40 CFR 264.99)		
		C 114	\checkmark	
1.	Does	facility operate a compliance monitoring program?		
	a.	Does facility determine concentrations of hazardous	1/	
	۵.	constituents at least quarterly?	Χ	
		tonian and tonian quantities of the contract o		
	b. "	Does facility determine ground-water flow rate and	_	
		direction in uppermost aquifer annually? (§264.99(e))	_X_	
			1	
	c.	Does facility analyze samples for Appendix IX		
		constituents annually? (§264.99(g))	4	
	d.	Does facility make statistically significant increases over		
	u.	background values? (§264.99(h))	\propto	
		background values: (4204.00(11))) in
	e.	If there is an increase, does facility notify the Regional	,	
		Administrator and establish a corrective-action program?	77	
		(§264.99(h))	V V	
. .				
Section	on H - Co	orrective -Action Program (40 CFR 264.100)	Л	
1.	Door 4	Parility follow a corrective action program that mosts the	\mathcal{N}	
1.		acility follow a corrective-action program that meets the y's permit requirements?	/ /\	
	Iduill	y a permit requirements:	/ `	

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?	X	
	a. Was the drip pad constructed prior to December 6, 1990?	X	e ⁻
	b. Is the drip pad inside or under a structure that provides protection from precipitation?		X
	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:	2 B	
	 Clean up the drippage? Document the cleanup of the drippage? Retain documents regarding cleanup for three years? Manage the contaminated media in a manner consistent with Federal regulations? 		

B - Design and operating requirements 26	5.443 Yes	No
1. Is the drip pad constructed as follows:	e i	
 a. Is the drip pad constructed of non-ear and non-structurally supported asphab. Is the drip pad sloped to free-drain to associated collection system? c. Does the drip pad have a curb or bend. 1. Does the drip pad have a hydraul equal to 10-7 cm/s? 2. Does the owner maintain on file of the drip pad certified by an indeprofessional engineer? Is the associated annually? e. Is the drip pad of sufficient structural failure? 	alt? reated wood drippage to the m around the perimeter? ric conductivity of less than or at the facility a written assessment rependent, qualified registered ressment reviewed, updated and response of the second conductivity of less than or A conductivity a written assessment reviewed, updated and A conductivity of less than or	
If the drip pad complies with 1.d. then skip to	5.	
2. Is the drip pad constructed with a synther	tic liner?	X

Droppad is scheduled to be recorded 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? 		XXX
4.	Does the drip pad have a leakage collection system immediately above the liner?		X
5.	Is the drip pad maintained free of cracks, gaps, corrosion, or other deterioration?	X	
6.	Is the drip pad designed to prevent run-off?	K	
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?	<u>X</u>	
8.	Is drippage and accumulated precipitation removed from the associated collection system as necessary to prevent overflow onto the drip pad?	χ.	
9.	Is the drip pad cleaned at least weekly and the cleaning and cleaning procedure documented?	X	
10.	Is treated material held on the drip pad until drippage has ceased?	X	
C - Inspections 265.444			No

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	X	ı
	system? c. Deterioration or cracking of the drip pad surface?	X	

RCRA Operating & Maintenance Inspection

Inspector and Author of Report

Bruce Ferguson, Environmental Scientist III Mississippi Office of Pollution Control FILE COPY

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. <u>Inspection Participants</u>

Bruce Ferguson, MOPC Tony Helms, KMCC Bud Klutey, KMCC Danny Price, KMCC

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 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 are 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 indention 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. <u>Conclusions</u>

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.

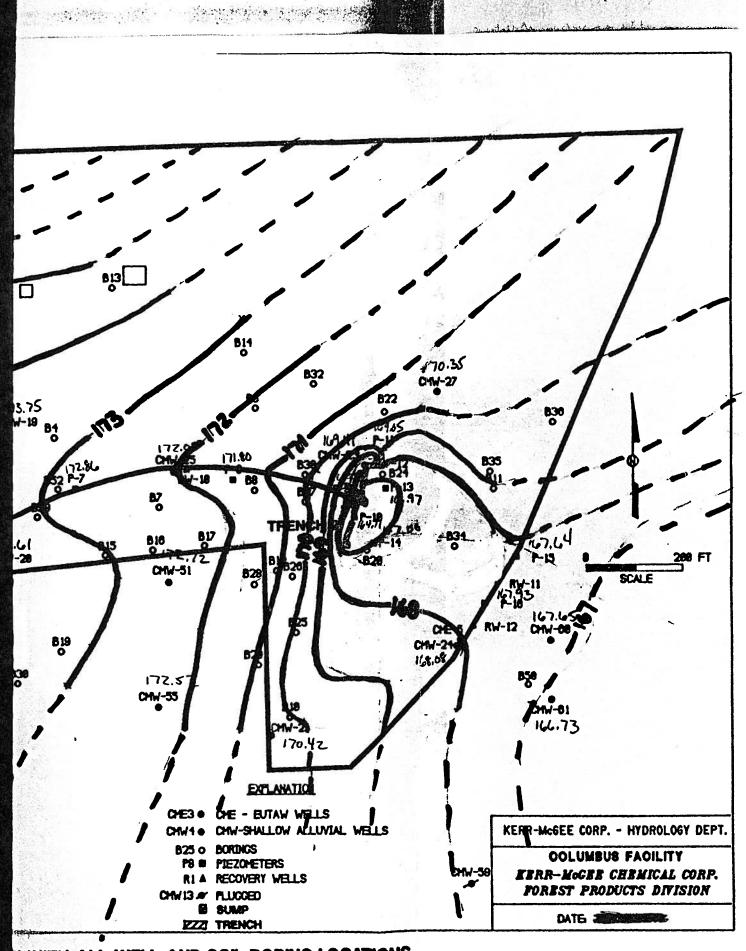
- 2. The teflon coated wire which is connected to the bailers appeared worn with the wire exposed. These cords may need to be replace to keep from losing the bailer in the well.
- 3. Monitoring well CMW-19 should be checked to ensure that the interior casing was not damaged by whatever caused the rotation of the well.
- 4. The eroded area in the southern portion of the closed impoundment should be repaired.

11. Signed

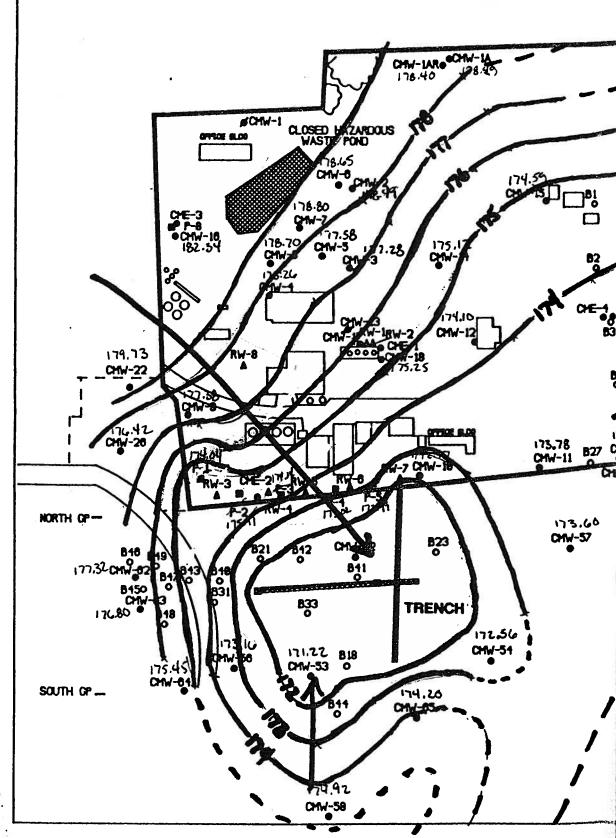
Bruce Ferguson, Inspector

Date

Jerry Banks, Supervisor



WITH ALL WELL AND SOIL BORING LOCATIONS



σ

FIGURE 1: COLUMBUS, MISSISSI



TREATED STORAGE YARD INCIDENT DRIPPAGE INSPECTION REPORT

DATE	LOCATION OF DRIPPAGE	DATE CLEAN- UP ASSIGNED	DATE CLEAN-UP COMPLETED	AMOUNT OF CLEAN-UP	INSPECTOR INITIALS	CERTIFICATION SIGNATURE
		 				
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NOTE -

COMPLETE DAILY WHILE PLANT IS IN OPERATION.

COMPLETE EVERY 72 HRS WHEN PLANT IS NOT IN OPERATION.

NOTIFY PLANT MANAGER WHEN DRIPPAGE EXCEEDS I POUND.



FIGURE 3-3

DRIP PAD/BLACK TIE STORAGE YARD INSPECTION REPORT KERR-McGEE CORPORATION, FOREST PRODUCTS DIVISION 40 CFR, SUBPART W WEEK OF

*DRIP PAD CONDITION Sloped for free draining Curbs Sealant Condition Crack free/Gap free Corrosion free		.1 =	:	•
Sloped for free draining Curbs Sealant Condition Crack free/Gap free			:	••
Sealant Condition Crack free/Gap free	<u> </u>	Ti.	: 04	
Crack free/Gap free		V2		
	`. 			
			7.24	
Dates cleaned:				
Cleaning procedure (code):	· N			
Trackage minimized				
Truckage managed				
4 (1) 1 (1)			15	590
*COLLECTION SYSTEM		•	9(8)	
Front door pit			•	
Sump pump				
Prevent run-on	3 ga a	6.		
Prevent run-off				
Overflow protection		39.0	-146	
Storage tank capacity:		1 10 1		
Dates cleaned				
Cleaning procedure				
			•	
*BLACK TIE STORAGE YARD				•
Appearance				
Debris free			12	¥
De Minimis drippage	* *	1 5		
			•	•
		j' o j	. :	
* Drip Pad and Collection	System	must be inspected	d every 7 d	lays or after a
≥ 2 inch rain in a a 24 ho	our period.	*5 55	•	**
Black Tie Storage Yard mus	t be inspe	cted monthly.		
	Car Page 1	. 00 4		
** All F034 waste must be re	moved ever	y 90 days.	- 8	
	1 65			
	W	, 2		P
CLEANING CODES:				
P - Pressure Wash		Signature:	111	
S - Steam	1,000	Time:	(if	
M - Mechanical		Date:	1.5	
B - Broom E - Emulsifier	10.12			

FIGURE 3-4

DRIPPAGE CERTIFICATION REPORT RERR-McGEE CHEMICAL CORPORATION, FOREST PRODUCTS DIVISION 40 CFR, Subpart W

Charge Number	Charge Pulled (Date)	Charge Pulled (Time)	Released (Date)	Released (Time)	Time on Pad (Hour)	Name (Print)	Signature
	****			•			
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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 c tasks. Those tasks are: 1) review enforcement and permitting actions the facility, 2) review the owner/operator's sampling and analysis prog the owner/operator's O&M program, and 4) prepare site-specific insperobjectives.	aken to date at ram, 3) review
1. Facility identification number MSD 996866329	
2. Name of facility contact John Getz phone number (601)	
3. Address of facility P.O Box 906 Columbs, 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)	₩ H
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.

5b. Actions taken at the facility (permit status)

Type	<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.

6a. Identify enforcement actions issued to the facility in regard to interim status violations.

Action	Date(s)
• §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.

6b. Identify enforcement actions issued to the facility after the permit issuance date.

Action	Date(s)
• §3008(a) complaint/order	<i>e</i>
• §3013 complaint/order	
• §3008(h) complaint/order	
• §7003 complaint/order	
• Referral for litigation	V
• 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.

7 Daviers and surrous to the	
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?	1
Specify the device to be used for measuring water level elevations?	11
Specify the procedure for measuring water levels?	1
Provide for the measurement of depth to standing water and depth to the bottom of the well to 0.01 feet?	11
Explain whether dedicated or non-dedicated sampling equipment is used and the type of sampling equipment?	TH
Describe procedures for evacuating wells?	
Provide for the use of sampling devices constructed of inert materials such as fluorocarbon resin or stainless steel?	11:
Provide for dedicated sampling devices for each well or alternately provide for decontamination of sampling devices and the collection of blanks between wells?	Wicald
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?	Ty
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 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.

COMMENTS	ON SAMPLING AND ANALYSIS PLAN	
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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
L.			•	
7				
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4				
5.		•		
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9.	*			
10.			£2.	
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 inplace 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

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 inspection S | S | 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?	1
Include an inventory of all sampling devices and purging equipment in use at the facility and information on model number, serial number and manufacurers name?	ers.
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?	SAR
Include schedules for performing operation and maintenance activities related to the ground-water monitoring system?	GA?
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?	
Include records of all monitoring information including all calibration and maintenance records?	1
Include records of monitoring information including determination of ground-water surface elevations?	प
Include a determination of ground-water flow rate and direction(s) in the uppermost aquifier on an annual basis (e.g., prepare a potentiometric map annually using data collected during the year)?	1
Provide for more frequent and intensive inspection of wells constructed of non-inert casing such as PVC? (Refer to Appendix A for permit example.)	ro

COMMENTS ON OPERA	ATING RECORD
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2. Visually inspect each well and piezometer and complete the table below (one line entry for each well or piezometer):

Well/ Piezometer	Survey Mark Present?	Standing or Ponded Water?	Evidence of Collision Damage?	Evidence of Frost Heaving?	Evidence of Casing De- gradation?	Lock in Place?	Evidence of Well Subsidence?	Photograph Taken?
CNWP			Yes			•		P
CAWIA		168						\sim
D.9		3/65				·		7
		lacks were	٤ .	place for	all wel	s uth	24	
		risers	sllacu .	with 8	with Allish manny	brom tu		
		het (elheeked A	Har GERES	S			
		All wells	lls need	mscoere	. Nothing	busyal	was	
		observed	ed unless	All Ca	so no	isted about	ورو،	,
Action of the second								

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	192.93	4.95	/	leleto			
CMW-1A	183,29	2.52	4.80	178.49			. •
CMW-1AR	784.59 183.61	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

						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	7.51	175,36		4.91	
CMW-18	183.72	2.81	8.47	175,25		1.23	
CMW-19	184.07	3.20	10.32	173,75			
CMW-20	182.86	3.20	9.25	173.61			,
CMW-21	181.10	3.38	10.72	170 42			
CMW-22	185.98	3.40	6.25	179.73			-
CMW-23	175.64	-0.19	7.23	16.41			
CMW-24	173.35	-0.28	5,27	168,58			
CMW-25	180.30	-0.43	8.22	172.68		4.84	
CMW-26	181.29	-0.35	4.87	176.42			
CMW-27	176.07	-0.74	5,12	176.35			
CMW-51	181.14	-0.32	8.42	172.72			
CMW-53	175.84	-0.20	4.62	171.22			
CMW-54	176.26	-0.30	3.70	172.56			
CMW-55	178.97	-0.22	6.45	172,52			
CMW-56	176.26	-0.39	3./0	173.16			
CMW-57	180.31	-0.41	6.71	173.60			
CMW-58	175.79	-0.33	0.87	174.92			
CMW-60	175.75	2.36	8.10	147,45			
CMW-61	175.92	2.32	9,19	166,73			
CMW-62	178.14	-0.25	.87	ורו 32. ררו			
CMW-63	177.84	-0.65	1.04	176.80			
CMW-64	178.56	-0.23	3.1/	175.45			
CMW-65	178.10	-0.26	3.90	174.20		; ;	

QUARTERLY GROUNDWATER ELEVATION DATA KERR-McGEE CHEMICAL CORPORATION FOREST PRODUCTS DIVISION COLUMBUS, MISSISSIPPI

Data recorded on 5/4/93

Page 3 of 3

<u></u>						Page 3 of 3	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	7.93	175,23			
CME2	181.13	2.61	6.68	178.52			
CME3	186.72	4.78	5.68	181.04			
CME4	183.01	2.41	11.19	171.82			
CME5	173.40	-0.08	9.31	164,09		(5)	(all
CME6	179.49	-0.12	15.42	164.07.		20	
RW1	183.06	2.95	7.70	17536		3.74	
RW2	182.67	3.00	Pm	m in u	ull		
P1	179.48	-0.14	5.44	174.04		TRACE	
P2	178.91	-0.10	3.44	175,47	:	000	
P3 ==	178.13	-0.14	3,99	174.14		0.60	
P4	177.24	-0.36	4,22	173.02		TRACE	
P5	177.55	-0.19	4,56	17299			
P6	179.44	-0.12	7,64	171.80			
P7	181.11	0.01	8.25	172.86	3	4.25	
P8	183.71	0.23	2.64	181.67	4.0		
P9	175.68	-0.26	9,47	166.21			
P10	175.63	-0.24	11,52	164.11			Ñ.
P11	175.84	-0.02	7.79	169.65			
P12	175.19	-0.30	7.18	168,01			
P13	173.97	-0.21	7.00	166.97		3,53	8
P14	175.00	-0.33	8,00	167.00			
P15	172.43	-0.24	4.79	16764			
P16	173.03	-0.30	5,10	167.93			

*

owner/operator's monitoring system. Record depth measurements to the nearest 0.01 feet. Record the measurements 3. Obtain data on depth to standing water and depth to the bottom of each monitoring well and piezometer in the

				sing casing	Tuesco and the same of the sam	has several options in sater elevation data.	from the operating	b. take his/her own depth measurements:	c. obtain data from the owner/operator sampling crew.	
Key: A - survey elevation mark B - protective outer casing C - gas vent	E - fitted lock F - primary casing mate	H - bore hole seal I - senuder space seal	X - filter pack L - height of riser	N - dismoter of outer casing O - dismoter of primary casing	P - regards or aprova Q - water level below surface	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 and/or	c. obtain data from sampling crew.	
Depth of Well/ Plezometer (0.01")			•	1950)					·	
Depth to Water (0.017)										
Well/ Piezometer I.D. No.						·				
9										

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):

Name	Sampling Experience (years and type)
•	
	Name

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?	7	2
Did the sampling crew use a steel tape or electronic device totake depth measurements?	4	2
Did the sampling crew record depths to +/- 0.01 feet?	1	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	red	
lower an interface probe into the well to detect immiscible layers.		7
If immiscible samples were collected, were they collected prior to well purging?	W	2
Did the sampling crew evacuate low yielding wells to dryness prior to sampling?	JA.	И
Did sampling crew evacuate high yielding wells so that at least three casing volumes were removed?	Y	η
Did the sampling crew collect the purge water for storage and analysis or for shipment off-site to a RCRA treatment facility?	in the stand	ten t
Were sampling devices constructed of fluorocarbon resins or stainless steel?	1	7

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?	cailers well casina	~
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. acctone rinse 5. pesticide-grade hexane rinse?	MA	Ν.
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?	MA	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?	4	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?	dend with	aperal N
If the sampling crew used bailers, did they lower the bailer slowly to the well?	6	N
If the sampling crew used bailers, were the bailer contents transferred to the sample container to minimize agitation and aeration?	14	N
Did the sampling crew take care to avoid placing clean sampling equipment, hoses, and lines on the ground or other contaminated surface prior to insertion in the well?	es	. H.
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?	MA	N
Was the bladder pump controller capable of throttling the bladder pump discharge flow to 100 mi/min or less for continuous periods of at least 20-30 seconds without restricting liquid discharge?	MA	N

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?	MA	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
Was bladder pump flow performance monitored regularly for dropoff in flow rate and discharge volume per cycle?	MA	Ν.
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 gs? 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?	m/s	N.
Did the sampling crew collect and containerize samples in the order of the volatilization sensitivity of the parameters?	1	M.
Did the sampling crew measure the following parameters in the field: pH, temperature, specific conductane?	1	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?	MA	W
Did the sampling crew use glass bottles with fluorocarbon resin- lined caps for samples requiring metals analysis?	i/A	V
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?	14	N
Did the sampling crew filter samples requiring analysis for organics?	N	N

	COMMENTS C)N SAMP	LING PROGRAM	1
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Part 1

General Site Information

Facility Name: Address:	Kerr-McGer P.O. Box 906 Columbus, MS 39701	
I.D. Number: Contact: Title: Phone Number:	MSD 9908666 329 John Gotz Plant Manager	
Type of Ownershi	p:	
Federal	StateCountyMunici	ipal Y Private
Facility Status:	63 1991	
Generator	TransporterTreatment	Storage X _Disposal
Regulatory Statu	1 S:	*
Interim Stat	Part B Submitte	
Principal Inspector Organization:	HS DES Phone Number	Title: ENU Sc. III er: (601) 9(01-514)
Inspection Parti	cipants:	₫ 2
Name Bauee Fereuso	Title Fry Se, III	Representing MS DECO
Jany Herms		
BO KLUTEY	HYDRO FIELD ASSISTME	KMCC
Sec		
	•	

Part	

GENERAL FACILITY CHECKLIST

Sect	tion A	A - General Facility Standards	
1.	Does	facility have EPA Identification No.?	χ Yes No NA
	a.	If yes, EPA I.D. No. 990866329	
2.	Has f	facility received hazardous waste from a foreign ce?	_Yes _No _NA
	a.	If yes, has it filed a notice with the Regional Administrator?	_Yes _No _NA
Was	te Ana	nalysi s	
3.		facility maintain a copy of the waste analysis at the facility?	YesNoNA
	a.	If yes, does it include: (264.13) (265.13)	33
	3	 Test methods used to test for these parameters? Sampling method used to obtain sample? Frequency with which the initial analyses will be reviewed or repeated? (For offsite facilities) waste analyses that 	Yes _No _NA
		b. Sampling method to be used to obtain representative sample of the waste to be	_YesNo &_NA _YesNo &_NA
4.	Does	s the facility provide adequate security through: (2	64.14) (265.14)
i E	a.	24-hour surveillance system (e.g., television monitoring or guards)?	<u>√</u> YesNo [^] _NA

Yes No NA

	b.	1. Artificial or natural barrier around facility	√Yes	N.	
		(e.g., fence or fence and cliff)?	Tres	NO	NA
		Describe Truck			
		AND			
•		2. Means to control entry through entrances (e.g.,			3
		attendant, television monitors, locked entrance			
		controlled roadway access)?	<u>X</u> Yes	No	NA
		Describe	3		
Ge	neral	Inspection Requirements (264.15) (265.15)			
				•	
5.		the owner/operator maintain a written schedule at facility for inspecting:			
	а.	Monitoring equipment?	Yes	No	NA
	b.		Yes		
	c.	Security devices:	Yes		_
	d.	Operating and structural equipment?	Yes	No	NA
	e.	Types of problems of equipment:	28	_	ē.
		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
Pe	ersonne	1 Training (264.16) (265.16)			
7.		the owner/operator maintain personnel training rds at the facility?	Yes	No	NA
	Date	of most recent training: Macu 1993	-		

How long are they kept? NORFINITELY	-
a. If yes, do they include:	2
 Job title and written job description of each position? Description of type and amount of training? 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 MNo _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?	
 If yes, use narrative explanation sheet to describe separation and confinement procedure If no, use narrative explanation sheet to describe sources of ignition or reaction. 	.
b. Are smoking and open flames confined to specifical designated locations?	Yes _No YNA
c. Are "No Smoking" signs posted in hazardous areas?	
d. Are precautions documented (Part 264 only)?	_Yes _No KNA
9. Check containers	
a. Are containers leaking or corroding?	_Yes _No X_NA
b. Is there evidence of heat generation from incompatible wastes?	_Yes _No X NA
Section B - Preparedness and Prevention	
1. Is there evidence of fire, explosion, or contamination of the environment? (264.31) (265.31)	Yes K_NoNA
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	NoNA
	1. Is it easily accessible in case of emergency?	Yes	NoNA
	b. Telephone or two-way radio to call emergency response personnel?	Yes	NoNA
	c. Portable fire extinguishers, fire control equipment spill control equipment, and decontamination equipment?		NoNA
	d. Water of adequate volume of hoses, sprinkers, or water spray system?	∑ Yes	NoNA
	1. Describe source of water City WATER		. 0
3.	Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (264.35)(265.35)	<u> </u>	nona
4.	Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazard 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)	lity	NONA
5.	In the case that more than one police or fire department might respond, is there a designated primary authority? (264.37) (265.37)	•	;
	a. If yes, name primary authority	r	
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)	-	NONA
	a. Are they really available to all personnel?	_Xes	NoNA
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)		nona
8.	If State or local authorities declined to enter into agreements, is this entered in the operating record?		•
36	(264.37) (265.37)	Yes	_No XNA

Sect	ion C - Contingency Plan and Emergency Procedures	
	•	<i>N</i>
1.	Is a contingency plan maintained at the facility? (264.53) (265.53)	YesNoNA
	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	Yes _No _NA
	and addresses?3. List of all emergency equipment at facility	`
	and descriptions of equipment? 4. Evacuation plan for facility personnel?	Yes No NA
	4. Evacuation plan for facility personner	Yresnona
2.	Is there an emergency coordinator on site or on call at all times? (264.55) (265.55)	Yes _No _NA
Sec	tion D - Manifest System, Recordkeeping, and Reporting	
1.	Does facility receive waste from offsite? (264.71)	
••	(265.71)	Yes XNoNA
	a. If yes, does the owner/operator retain copies of all manifests?	yesno _Xna
	1. Are the manifests signed and dated and	· · · · · · · · · · · · · · · · · · ·
	returned to the generator? 2. Is a signed copy given to the transporter?	Yes No XNA
	2. Is a signed copy given to the transportation	
2.	Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71)	_Yes XNoNA
	a. If yes, is it accompanied by a shipping paper?	YesNo XNA
	 Does the owner/operator sign and date the shipping paper and return a copy to the 	
	generator?	YesNo _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 X_NoNA
	a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter?	_Yes _No XNA
	1. If no, has Regional Administrator been	Yes No NA
•	notified?	TIES TWO JWY

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			*		
4.			owner/operator keep a written operating the facility? (264.73) (265.73)	Yes [NoNA
	a.	. If ye	es, does it include:		
		1.	Description and quantity of each hazardous waste received?	Yes	_no_\na
		2.	Methods and dates of treatment, storage, and disposal?		_no _na
		3.	Location and quantity of each hazardous waste at each location?	Yes	_No YNA
		4.	Cross-references to manifests/shipping papers?		_no X na
			Records and results of waste analyses?		No YNA
			Report of incidents involving implementation of the contingency plan?	_Yes	_No KNA
•			Records and results of required inspections? Monitoring, testing, and analytical data, for	Yes	_No ANA
			groundwater required by Subpart F?	Yes	NoNA
		9.	Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)?	'Yes	_no \(\frac{1}{2}\)na
		10.			No X NA
	È	Does	s facility have copy of permit on site?	Yes	NoNA
			facility submit a biennial report by March 1 en-numbered year? (264.75) (265.75)	XYes	_No _NA
	ā		yes, do reports contain the following ormation:		
		•	EPA I.D. number?	Yes	No NA
		2.	Date and year covered by report?	Yes	NoNA
			Description/quantity of hazardous waste?	YYes	NoNA
			Treatment, storage, and disposal methods? Monitoring data under Section 265.94(a)(2)	•	NoNA
			and (b)(2) (Part 265)? Most recent closure and post-closure cost	Y Yes	_No _NA
			estiamtes?	<u>K</u> Yes	No NA
	(5)	7.	For TSD generators, description of efforts to reduce volume/toxicity of waste generated,	y	
		8.	and actual comparisons with previous year?	Yes	NoNA NoNA
,	5. H	as the	facility received any waste (that does not come	•	
	u	nder the	e small generator exclusion) not accompanied ifest? (264.76) (265.76)		No _NA
		a. If	yes, has he submitted an unmanifested waste		NoNA
		rep	ort to the Executive Director?	1 & g	TWO TWA

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

<u>X</u>Yes __No __NA

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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 circumstar	nces
	true:	
	ci de.	
	1. Granted extension from effective date pursuant	± ./
	to Section 268.5?	YesNo NA
	2. Granted exemption from a prohibition pursuant	
	to a petition under Section 268.6?	_Yes _No XNA
	3. Disposing of soil or debris resulting from a	
	CERCLA response action or a RCRA corrective	76
	action, which will not be prohibited until	
	November 8, 1988?	Yes No V NA
	4. Facility is a small quantity generator of	_Yes _No XNA
	less than 100 kg of hazardous waste per	
	month?	YES NO VNA
	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
	9	++
3.	Are there active surface impoundments used for treatmen	t 1/
	of hazardous wastes?	YesNoNA
	a. If yes, does the unit's design and operation meet	ν
	the requirements set forth in Section 268.4?	_Yes _No YNA
4.		
	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 analysi	
	comprehensive environmental characterization of un	
	<pre>site, QA/QC plan, sampling, testing, modeling)?</pre>	_Yes _No /\ NA
_	Was the feething dehamined whether it persuates a	
5.	Has the facility determined whether it generates a	V
	restricted waste through waste analysis? (268.7)	Yes _No _NA
	a. If yes, is the facility, in fact, handling a	· · · · · · · · · · · · · · · · · · ·
	a. If yes, is the facility, in fact, handling a restricted waste(s)?	Yes \(\frac{1}{2} \) NoNA
	TOUCTTORER MERCOINI.	— 163 4 HO — NA
	b. If yes, does the restricted waste required	
	treatment?	Yes Xno NA

		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)?	YesNo
6.		the facility handle EPA Hazardous Waste Nos. F001 agh F005 (solvent wastes)? (268.10)	Yes \(\frac{1}{2} \) NoNA
	a.	If yes, do any of the following conditions apply:	
	2	 The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? The solvent waste is generated from a CERCLA response corrective action? The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-containing sludge, or RCRA correctiaction) containing less than 1 percent total F001 through F005 solvent constituents. 	_Yes _No \\nA _Yes _No \\nA ve _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.		the facility handle EPA Hazardous Waste Nos. F020, , F023, F026, F027, or F028 (dioxin-containing es)?	_YesNoNA
	a.	If yes, do any of the following conditions apply:	
		 Wastes are treated to meet standards of Subpar D of Section 268? Wastes are disposed of at a facility that has been granted a petition? An extension has been granted? 	YesNoNA YesNoNA YesNoNA
	b.	If no, were these restricted wastes land disposed after November 8, 1988?	Yes No NA
8.	Are	restricted wastes being treated?	_Yes Ano _NA
	a.	If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels?	_Yes _ No

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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
If an F003 wastestream (listed solely for ignitability been mixed with a non-restricted solid or hazardous wa does the resultant mixture exhibit the ignitability characteristic?	-
Note: Appendix A is intended to assist the inspector and experior official in determining whether the facility is generally wastes, if such wastes were not identified by the far previously. If you are concerned that F-solvent was misclassified or mislabeled, turn to Appendix A-1. identifying potentially misclassified F-solvents, Appresents a list of corresponding F and U wastes.	erating F-solvent scility stes may be To assist in
 Dioxin wates (F020-F023, F026-F028) Potential California List Wastes (see Appendix C) 	Yes No NA Yes No NA Yes No NA Yes No NA
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?	_Yes <u>X</u> no _na
(See Appendix F) 4. First Third Wastes (See MHWMR 268.10) 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 Identific	cation
a. Does the generator mix restricted wastes with different treatment standards for constituents of concern?	_Yes XNO _NA

P	a	r	t		

GENERATOR'S CHECKLIST

<u>Sec</u>	tion P	1 - EF	A Identification No.			
1.	Does	gener	rator have EPA I.D. No.? (262.12)	<u> </u>	No _	_NA
	a.	If ye	es, EPA I.D. No. 990 & 66 3 Z 9	•		
			100			
Sec	tion I	B - Ma	nifest	۸/		
1.	Does	gene	rator ship waste offsite? (262.20)	es	No	_NA
	a.	If no	o, do not fill out Sections B and D.	•	•	
	b.		es, identify primary offiste facility(s).	1		
2.	Does	gene	rator use manifest? (262.20)	Yes	No	NA
	a.	If no	o, is generator a small quantity generator erating between 100 and 1000 kg/month)?	Yes	No	<u>X</u> na
	e ⁻ ,	1.	If yes, does generator indicate this when sending waste to a TSD facility?	Yes	No	× _{NA}
	b.		es, does manifest include the following rmation?	Yes	_No	NA
		1.	Manifest document No.	Yes	No	NA
	·	2.		√ 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
			 Alternate facility name, address, and EPA I.D. No. 	X Yes	No	NA
			c. Instructions to return to generator if undeliverable	$\overline{\chi}_{Yes}$	— No	— NA
		6.	Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number)		U.	
		7.	Emergency information (optional) (special	<u></u>	_	_
		#8	handling instructions, telephone No.)	Yes	No	NA
		8.	Is the following certification on each	2000	No	NA
			manifest form?	Yes	MO	M

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.

	of Transportation and the EPA.	1/		
	9. Does generator retain copies of manifests?	Yes	No_	NA
_	complete a through e.			
a.	1. Did generator sign and date all manifests? 2. Who signed for generator? Name Title	Yes	No No	NA NA
b.	1. Did generator obtain handwritten signature and date of acceptance from initial transporter? 2. Who signed and dated for transporter? Name	A _{Yes} Ares	No	NA
d.	Does generator retain one copy of manifest signed by generator and transporter? Do returned copies of manifest include facility owner/operator signature and date of acceptance? Does generator retain copies for 3 years?	Yes Ayes Ayes	No	_
Section	C - Hazardous Waste Determination			
1. Does	generator generate solid waste(s) listed in Subparist of Hazardous Waste)? (261.30)	Yes	No	NA
. a.	If yes, list waste and quantities (include EPA Hazardous Waste No.)			
exhi	generator solid waste(s) listed in Subpart C that bit hazadous characteristics? (corrosivity, tability, reactivity, EP toxicity) (261.20)	Yes	_Xno	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?	. 		
	 If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? 	Yes	No	<u>X</u> 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	<u>\</u> NA
	 If no, list wastes and quantities deemed nonhazardous or processes from which non- hazardous waste was produced (use additional sheet if necessary). 			
Soc	tion D - Pretransport Requirements			
Sec	CION D - Flettansport Regultements			
	Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30)	Yes		
2.	a. Are containers to be shipped leaking or corroding? b. Use sheet to describe containers and condition.			
84	c. Is there evidence of heat generation from incompatible wastes in the containers? (262.31)	Yes	No	MA
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)	<u>X</u> yes	No	NA
	Label saying: <u>HAZARDOUS WASTE</u> - Federal Law Prohibits Improper Disposal. If found, contact the nearest polic or public safety authority or the U.S. Environmental Protection Agency.	ту		•
18	Generator name(s) and address(es)			
				•
	Manifest document No.			
6.	Does generator have placards to offer to transporters? (262.33)		No	NA

7. Accumulation time: (262.34)	
a. Are containers used to temporarily store waste before transport?	Yes _No _NA
 If yes, is each container clearly dated: Also, fill out rest of No. 7 (accum. time) 	XYes _No _NA
b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections)	Yes _No _NA Yes _No _NA
2. If yes, with what frequency? Meckly	Yes No NA
c. Does generator locate containers holding/ignitable or reactive waste at least 15 meters (50 feet) fro the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes)	
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?	YesNoNA
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.	ă
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 c. Exception reports	Yes No NA
c. Exception reportsd. Test results	Yes No NA
2. Where are the records kept (at facility or elsewhere)?	22
3. Who is in charge of keeping the records?	
Name Tony Homs Title Ass My	
-	

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Appendix I - Satellite Accumulation Area 1. Source/Area: 2. Type waste: 3. Condition of Containers: a. Containers closed? b. Containers properly labeled? 4. If > 55 gallons accumulated, has generator complied with 262.34(c)(2)? Yes No NA

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

Waste Name: Incidence Dignal
Waste Code: FO3Y'
Process Generating Waste: A That From Me/C
Spile for drappe in Mer
How was determination made?
XKnowledge of Waste. Describe.
Testing. Describe.
Waste Generation Rate (may be estimated) Disposal Procedure:
Site/Firm:
Is waste subject to requirements of MHWMR 268? YesNo Describe.
Is waste excluded under MHWMR 261.4? Yes No Describe.

•	Te did the commenter select the most	
b.	If yes, did the generator select the most	
	stringent treatment standard for the constituent	YesNo X_NA
	of concern [Section 268.41(b)]?	
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	
120	methylene chloride, all other spent solvent	1945 .
	wastes)?	_Yes _No ANA
		– – T
d.	California Wastes	921
	•	
	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	.1
	mg/kg [Section 268.32(a)(3)]?	_Yes _No YNA
	mg/xg (Beccion 200.32(a/(3/).	
_	First and Second Third Waste	
e.	First and Second Inite waste	
	1. Did the generator ascertain whether restrict	ad
	wastes were appropriately assigned wastewate	
-	or nonwastewater designations (nonwastewater	
	are > 1% TOC and > 1% suspended solids)	_Yes _No _NA
	[Section 268.7(a)]?	Ties Tuo Tivy
	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,	
	<pre>pipe routing, point of sampling)?</pre>	_Yes _No \(\frac{\lambda}{\text{NA}}\)
		1
Wast	e Analysis	
a.	Did the generator determine whether the waste	
	exceeds treatment standards based on Section 268.	7(a):
		./
	1. Knowledge of wastes	_Yes _No XNA
	•	
	(i) List wastes for which "applied knowled	ge"
	was used:	-

з.

			N
2.	TCLP		Yes No NA
	(i)	Milantal druppas C 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 ANA
		If yes, list:	• 1
3.	Total	. waste analysis	_Yes _No ANA
4.		les were retained, describe content and of applied knowledge determination:	*
	analy of te	etermined by TCLP or total constituent sis, provide date of last test, frequence sting, and attach test results.	:
	Note	which wastes were subjected to which tes	sts:
	varia	any problems (e.g., inadequate analysis, ation of waste composition/generation for led knowledge)	
5.	analy [Sect	wates tested using TCLP or total constitutions when a process or wastestream change ion 264.13(a)(3)(i) or Section 13(a)(3)(i))?	
trea	atabili	estricted wastes exceed applicable ty group treatment standards upon a [Section 268.7(a)(1)]?	
		•	

b.

	List those that did not exceed standards:	- a
c.	Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [Section 268.3]	YesNoNA
	6. Has the generator conducted any testing of those hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes?	YesNoNA
	If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?	YesNo ANA
4. Mana	gement	
a.	Onsite management	8
	1. Were restricted wastes managed onsite?	_Yes KNo /NA
١	 For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal 	N
5.7	conducted?	_Yes _No _NA
- ·	If yes, TSDF checklist <u>must</u> be completed.	
b.	Offsite Management	
	 If restricted wastes exceed treatment standard 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	· · · · · · · · · · · · · · · · · · ·
	 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

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	(iii) Manifest number	Yes	_no Kna
	(iv) Certification regarding waste and that		,
	it meets treatment standards?	Yes .	_no \$\pi na
Ide	entify land disposal facilities receiving the		
BDA	T certified wastes		
_		•	
3.			-
	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	1921	
	each waste shipment [Section 268.7(a)(3)]:		
	(i) EPA Hazardous Waste Number?	Yes	NO KNA
	(ii) Corresponding Treatment Standards?	Yes .	_no Ana
	(iii) All applicable prohibitions?	Yes	_NO MNA
	(iv) The manifest number?	Yes	_no Ana
	(v) The date the wastes are subject to		—··· 4 ····
	prohibitions?	Yes	_no ⊈na
	(vi) Does generator keep records of all		- 4····
	notifications/certifications send to		.,
	offsite facilities?	Yes	_no <u>1</u> na
	List all prohibited wastes for which records are not provided per above [Section 268.7(a)()	b): 	
	Identify TSDFs receiving any prohibited waster subject to any exemptions and variances:	s 	
4.	If handler generates a "soft hammer" waste, do the generator send with each "soft hammer" was shipment to a TSDF and retain copies of, a not that includes [268.7(a)(4)]:	ste	W
	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 ANA
	(i) Do the generator's records indicate that	Ė	
	any soft-hammer wastes are destined for		
	disposed in a landfill or surface	S\$ 54	
	<pre>impoundment [Section 268.33(f)]?</pre>	Yes	_no <u> </u>

.. 3.7

			If yes, list facility of destination and waste of concern [Section 268.8(a)(2)]	
	ŧ	,,,,	The the property submitted demonstration	ns
*		(11)	Has the generator submitted demonstration and certifications for each "soft-hammer waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of w to the TSDF [Section 268.7(a)(2)]?	ed" 1
		(iii)	Has the generator retained a copy of the demonstration on site [Section 268.8(a)((a)(4))?	3)- YesNo <u> N</u> A
	:= L =	(iv)	Has the generator retained copies of all Section 268.8 certifications sent to the TSDF [Section 268.7(a)(6)]	
885		(v).	Did the generator submit the demonstration to the receiving facility upon the inition shipment of the waste [Section 268.8(a)(a)(4)]?	al
. 3	•	(vi)	If the Regional Administrator has invalid the certification, has the generator ceasingment of the waste and do records income that the generator has informed all rece facilities of the invalidation [Section 268.8(b)(3)]?	nsed licate
5.	Stor	age of Proh	ibited Waste	
	a.	Were prohidays?	bited wastes stored for greater than 90	_Yes _No 🕺 NA
			as facility operating as a TSD under catus or final permit [Section ?	YesNo X_NA
78		If yes, T	SDF Checklist must be completed.	
6.	(i.e	tment Using, boilers, tment tanks	RCRA 264/265 Exempt Units or Processes furnaces, distillation units, wastewaters, etc.)	
	1.		ment residuals generated from RCRA mempt units or processes?	_Yes _No 🕍NA

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		If yes	, list type of treatment unit and processes	10
		If yes	, TSDF checklist must be completed.	
Sec	tion	C - Tre	atment, Storage & Disposal Requirements	
1.	Gene	ral		
	a.		the facility conduct waste analysis (total and on-site or through a commercial laboratory?	
	b.	Descri facili	the the frequency of sampling conducted by the	
2.	Trea	itment I	Facilities	77
	a.	analys	ne treatment facility revised its waste sis plan [Section 268.7(b)] to meet the rements of Section 264.13 or 265.13?	_Yes _No _NA
· 3	•	(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 \(\int \)NA
		(ii)	Is the treatment facility using the paint filter test for the California waste residues [Section 268.7(b)(ii)]?	Yesnona
			Is the treatment facility testing the pH of California waste residues?	_Yes _No INA
S		(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 \(\frac{1}{N} \) 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 XNA

٦.	Land	Disposal	Facilities
•		222242	

a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]?

_Yes _NoX_NA

b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [Section 268.7(c)(2)]?

_Yes _No KNA

c. Are they being tested in conformance with the frequency specified in the waste analysis plan [Section 268.7(c)(3)]?

__Yes __No X_NA

d. Are the appropriate tests (TCLP vs. total waste) being used [Section 268.7(c)(2)]?

__Yes __No X_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 XNA

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 1NA

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 1 NA

If yes, state how:

f. Was/is waste exceeding treatment standards stored for more than one year?

__Yes __No /_NA

		
at	ment in Surface Impoundments (Section 268.4)	
	Are prohibited wastes placed in surface impoundments for treatment?	YesNo
	Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [Section 268.4(b) and Section 268.3]?	YesNo
	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)]?	_YesNo
	Have the minimum technology requirements been met [Section 268.4(a)(4)]?	_Yes _No
	 If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [Section 268.4(a)(3)(iii)]? 	_YesNo
	Have the Subpart F groundwater monitoring requirements been met [Section 268.4(a)(3)]?	YesNo
	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
	Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels?	YesNo
	Provide the frequency of analyses conducted on treatment residues:	

5.

	i.	Does the operating record adequately document the results of waste analyses performed [Section 264.13 or Section 265.13]?	Yes _	_no <u>M</u> 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 MA.
		 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) 		_no <u>A</u> 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 Ana
	1.	When removed, were residues of restricted wastes managed subsequently in another surface impoundment?	Yes	_no <u>N</u> na
		1. Were these residues subject to a valid 268.8 certification?	Yes	_ио <u>Х</u> иа
	m.	When removed, were wastes treated prior to disposal?	Yes	_no Kna
		1. If yes, are waste residues treated on or offsite?	Yes	_no/Lna
· · · · · · · · · · · · · · · · · · ·		2. Identify management method:	_	
6.	. Othe	er Treatment		
	a.	Does the facility operate treatment units (regulat or exempt) (not including surface impoundments)?	ed Yes	no <u>K_</u> na
	b.	including event		15
	c.	Does the facility treat soft-hammered wastes?	Yes	_no Kna

		<pre>1. If yes, is treatment occurring as described in the generator's certification/demonstration [Section 268.8(c)(1)]?YesNoNA</pre>
		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)]? YesNo 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)]?
	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)]?YesNoNA
	e.	Describe frequency of testing of treatment residuals.
-	f.	Was dilution used as a substitute for treatment [Section 268.3]? YesNoNA
	g.	Are all notifications, certifications, and results of waste analyses kept in the operating record [Section 264.73(b) or Section 265.73(b)]? YesNoNA
	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)]?
(£.	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)]?YesNoXA

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?)_	_YesNo \(\frac{NA}{NA} \)
ł		Did facility have the notice and certification from generators/treaters in its operating record that all prohibited wastes disposed met standards	_YesNoNA
•	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)]?	YesNo /_NA
		If yes, was the frequency of testing as required by the facility's waste analysis plan [Section 264.13 or 265.13]?	YesNo /_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)]?	YesNo \lambda_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 An
		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)]?	YesNo \(\sqrt{N} \)
	f.	Were adequate records of disposal maintained [Section 264.73(b) or 265.73(b)]?	_Yes _No XN
	g.	If wastes subject to a nationwide variances, case-by-case extensions [268.5], or no migration petiti [268.6] were disposed, does facility have generate notices [268.7(a)(3)] and records of disposal? [Section 264.73(b) or Section 265.73(b)]	ons
	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 <

i.	hamme	ne owner/operator is disposing of a soft- er waste, is he maintaining the generators treaters (if applicable) notices and		N
	cert	ifications [Section 268.8(a)(2)-(a)(4)]?	Yes_	_no \(\frac{1}{2} \) na
	1.	Is the facility disposing of any soft		
				1
		California wastes?	_Yes	_no_na
	2.	Did the facility seek to verify whether		
		these wastes may be subject to all restrictions	,	~
		- California bana	Voc	No A Na

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Section F - Special Conditions

shipment?

1. Has generator received from or transported to a foreign __Yes _No __NA Administrator? If yes, has he filed a notice with the Regional _Yes _No ANA Administrator? b. Is this waste manifested and signed by a foreign __Yes __No XNA cosignee? c. If generator transported wastes out of the country, has he received confirmation of delivered _Yes _No \(\sqrt{NA} \)

Part		

SURFACE IMPOUNDMENTS CHECKLIST

Section	on A - Design Requirements (264.221) (265.221)			
1. De	pes 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	X _{NA}
	collection system requirements because Regional Administrator has determined that impoundment's design will prevent the migration of hazardous constituents?	Yes	No	X NA
	c. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)?		No '	2.
	d. If impoundment does not have a double liner, is		No	10
, š .	 Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand. Monofill has at least one liner for which there is no evidence of leaking. 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	X _{NA}
	f. Is impoundment surrounded by dikes (Part 264)?	Yes	_No	XNA
Sect	on B - Operating Requirements			
	Opes owner/operator maintain at least 60 cm (2 ft) of freeboard (Part 265)? (265.222)			
	Opes owner/operator have certification from a qualified engineer that alternate design features will prevent overtopping? (Part 265) (265.222)	Yes	No	√NA

Sect	tion C - Containment Systems	
1.	Do all dikes have a protective cover such as grass, shale or rock? (Part 265) (265.223)	_Yes _No \(\sqrt{NA} \)
Sect	tion 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 \(\frac{1}{NA} \)
	b. Chemically treat hazardous waste with a	- V
	substantially different process than any previously used in that impoundment?	YesNo NA
2.	If the answer in #1 was yes to any questions, has the owner/operator:	, í
	a. Conducted waste analysis or trial treatment tests?b. Obtained written, documented information on	_Yes _No XNA
	treatment of similar wastes under similar operating conditions?	_Yes _No XNA
		`
Sec	tion E - Inspections and Monitoring	
1.	Does the owner/operator:	
	a. Inspect the freeboard at least one each operating day? (265.226)	_Yes _No _NA
165	b. Inspect the surface impoundment including dikes and vegetation at least once per week and after	YesNo \(\int \)NA
	storms? (264.226) (265.226)	_res _no Ana
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
	Scructural integrity: (204.225)	
	· 8	
Sec	tion F - Emergency Repairs, Contingency Plans (Part 264)	•
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 condition	
	1. Sudden drop in liquid level?	_Yes _No _NA

*

		2. Leaking dike?	Yes	No	ANA
	b.	Does plan detail the steps to be followed when remoimpoundment from service, including:	ving		
		 Shutting off flow into impoundment? Containing any surface leakage? 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?		Nо	√ _{NA}
	d.	If impoundment was removed from service and was not restored to service, was impoundment closed in accordance with an approved closure plan?		No	¥na
Sect	ion (G - Closure and Post-Closure (264.228) (265.228)		5	
1.	Is a	closure plan retained at the facility?	Yes	No	NA
2.	At c	losure, did owner/operator:			
	ъ. с.	Remove standing liquids (Part 265)? Remove waste and waste residue (Part 265)? Remove liner (Part 265)? Remove underlying and surrounding contaminated soil?	Yes Yes Yes Yes	No	NA
	e.	If not, did owner/operator demonstrate to Regional Administrator that the above materials were non-hazardous (Part 265)?	Yes	мо	NA
		 If no, has owner/operator closed the impoundment and provided post-closure care (Part 265)? 		No	NA
3.	If r	egulated under Part 264, has owner/operator: (264.2	228)		
		Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment and managed them as hazardous waste?	ment,	No	NA
	b.	remaining wastes or waste residues?	Yes	No	NA
		Stabilized remaining wastes to a bearing capacity sufficient to support final cover?	Yes	No	NA
		Covered the impoundment with final cover?	Yes	No	—NA
4.		owner/operator leave any residuals in place at ure (Part 264)? (264.228)	√Yes	No	NA

5.	In post-closure, does owner/operator maintain integrity of cover and groundwater monitoring system, and prevent runon and runoff? (264.228) (265.228)	Yes	No _	_NA
Sec	tion H - Ignitable and Reactive Wastes (264.229) (265.23	29)		
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	<u>N</u> A
Sec	tion I - Incompatible Wastes (264.230) (265.230)			λ
1.	Are incompatible wastes placed in the impoundment?	Yes	No _	_NA

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Part	

GROUNDWATER MONITORING CHECKLIST

Section A - Monitoring System

1.	Does the facility have a groundwater monitoring system in operation?	YesNoNA
	a. If yes, does the system consist of: (265.91)(264.	97)
	 At least one upgradient/background well? 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)?	YesNoNA
	d. Are well heads locked?	Yes _No _NA
	e. Do well heads have bumper guards or are otherwise protected?	Yes _No _NA
Sec	tion B - Sampling and Analysis (Part 264)	2
1.	Does the facility obtain and analyze samples from the groundwater monitoring system?	XyesNoNA
2.	Has facility developed and followed a groundwater sampling and analysis plan? (264.97(d))	YesNoNA
	a. If yes, does this plan include procedures and techniques for:	
	 Sample collection? Sample preservation? Analytical procedures? Chain-of-custody control? 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 XNA
4.	Is all groundwater monitoring data recorded in the operating record?	Yes No NA

Section C -	Detection	Monitoring	Program	(264.98)

2. Collect at least four samples from each well at least semi-annually? (264.99(f))YesNoNA 3. Determine whether there is statistically significant evidence of increased contamination at each monitoring well?YesNoNA 4. If an increase was indicated, did facility notify the Executive Director?YesNoNA 5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually?YesNoNA	system to releases	provide reliable indications for detection	_Yes _No NA
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 MHWR 264.98(g)(5)? 6. Is all information contained in the facility's operating record? Section D - Compliance Monitoring Program (264.99) 1. Does the facility operate a compliance monitoring program? 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? Yes _No _NA _NA _Nappendix IX of Part 264 at least annually? Yes _No _NA			· ·
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 MHWR 264.98(g)(5)? 6. Is all information contained in the facility's operating record? Section D - Compliance Monitoring Program (264.99) 1. Does the facility operate a compliance monitoring program? 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? Yes _No _NA _NA _Nappendix IX of Part 264 at least annually? Yes _No _NA	1.	Background values?	_Yes _No \(NA
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? Section D - Compliance Monitoring Program (264.99) 1. Does the facility operate a compliance monitoring program? 2. 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? YesNoNANANANANANANA			Y
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? Section D - Compliance Monitoring Program (264.99) 1. Does the facility operate a compliance monitoring program? 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? (264.90(e)) 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			_Yes _No YNA
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 MHWNR 264.98(g)(6)? 6. Is all information contained in the facility's operating record? Section D - Compliance Monitoring Program (264.99) 1. Does the facility operate a compliance monitoring program? 2. 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? Yes No NA NA Papendix IX of Part 264 at least annually? Yes No NA NA Section E - Corrective Action Program (Part 264 only) (264.100) 1. Does facility follow a corrective action program that	3.		
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? Section D - Compliance Monitoring Program (264.99) 1. Does the facility operate a compliance monitoring program? 2. 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? Yes _No _NA _NA _NA _NECORD RECORD			Ves No K NA
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? YesNoNA Section D - Compliance Monitoring Program (264.99) 1. Does the facility operate a compliance monitoring program? 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? YesNoNA 6. Record all information in the operating record? YesNoNA Section E - Corrective Action Program (Part 264 only) (264.100) 1. Does facility follow a corrective action program that	A	each well: (204.70(1)) If there was a statistically significant	—,co.— —,
the Executive Director per 264.98(g)(1)?YesNoNA	4.		*
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? Section D - Compliance Monitoring Program (264.99) 1. Does the facility operate a compliance monitoring program? 2. 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? Yes No NA NA Record all information in the operating record? 2. Yes No NA NA Section E - Corrective Action Program (Part 264 only) (264.100)			_Yes _No X_NA
unit per MHWMR 264.98(g)(6)? 6. Is all information contained in the facility's operating record? YesNoNA Section D - Compliance Monitoring Program (264.99) 1. Does the facility operate a compliance monitoring program? 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? YesNoNANA	5.	Did facility attempt to demonstrate an	`
6. Is all information contained in the facility's operating record? YesNoNA Section D - Compliance Monitoring Program (264.99) 1. Does the facility operate a compliance monitoring program? 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? YesNoNA 6. Record all information in the operating record? YesNoNA Section E - Corrective Action Program (Part 264 only) (264.100) 1. Does facility follow a corrective action program that			ed K
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2. Collect at least four samples from each well at least semi-annually? (264.99(f))YesNoNA 3. Determine whether there is statistically significant evidence of increased contamination at each monitoring well?YesNoNA 4. If an increase was indicated, did facility notify the Executive Director?YesNoNA 5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually?YesNoNA 6. Record all information in the operatingYesNo		Determine the groundwater flow rate and	**
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? Section E - Corrective Action Program (Part 264 only) (264.100) 1. Does facility follow a corrective action program that		Determine the groundwater flow rate and direction in the uppermost aquifer annually?	_Yes _No _NA
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? Section E - Corrective Action Program (Part 264 only) (264.100) 1. Does facility follow a corrective action program that	1.	Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well	_Yes _No _NA
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Appendix IX of Part 264 at least annually?YesNoNA 6. Record all information in the operatingYesNoNA record?YesNoNAYesNONAYesNONAYesNONAYesNONAYesNONAYesNONAYesNOYesNOYesNONAYesNO	2.3	Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminatinate each monitoring well?	YesNo _XNAYesNoNA
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	2.3	Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well? If an increase was indicated, did facility	YesNo 🕺 NA
record? YesNoNA Section E - Corrective Action Program (Part 264 only) (264.100) 1. Does facility follow a corrective action program that	1 2 3	Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well? If an increase was indicated, did facility notify the Executive Director? Analyze samples for constituents listed in	YesNo XNA YesNo XNA YesNo XNA
Section E - Corrective Action Program (Part 264 only) (264.100) 1. Does facility follow a corrective action program that	1 2 3	Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well? If an increase was indicated, did facility notify the Executive Director? Analyze samples for constituents listed in Appendix IX of Part 264 at least annually?	YesNoNAYesNoNAYesNoNAYesNoNA
1. Does facility follow a corrective action program that	1. 2. 3. 4. 5.	Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well? If an increase was indicated, did facility notify the Executive Director? Analyze samples for constituents listed in Appendix IX of Part 264 at least annually? Record all information in the operating	YesNoXNAYesNoXNAYesNoXNAYesNoXNA
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	1. 2. 3. 4. 5.	Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well? If an increase was indicated, did facility notify the Executive Director? Analyze samples for constituents listed in Appendix IX of Part 264 at least annually? Record all information in the operating	YesNoXNAYesNoXNAYesNoXNAYesNoXNA
	1. 2. 3. 4. 5. 6.	Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well? If an increase was indicated, did facility notify the Executive Director? Analyze samples for constituents listed in Appendix IX of Part 264 at least annually? Record all information in the operating record?	YesNoXNAYesNoNAYesNoXNAYesNoXNAYesNoXNAYesNoXNA
	2 3 4 5 6	Determine the groundwater flow rate and direction in the uppermost aquifer annually? (264.99(e)) Collect at least four samples from each well at least semi-annually? (264.99(f)) Determine whether there is statistically significant evidence of increased contaminati at each monitoring well? If an increase was indicated, did facility notify the Executive Director? Analyze samples for constituents listed in Appendix IX of Part 264 at least annually? Record all information in the operating record? Corrective Action Program (Part 264 only) (26)	YesNoXNAYesNoNAYesNoXNAYesNoXNAYesNoXNAYesNoXNA

Section F - Sampling and Analysis (Part 265)

۱.		he facility developed and followed a groundwater ing 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
Ē		3. Analytical procedure?	Yes No NA
		4. Chain-of-custody control?	Yes No NA
2.	Has 1	the owner/operator established initial background	-
	conce	entrations or values of all parameters specified in	./
	265.9	92(b)?	_Yes _No KNA
	a.	Samples collected to establish background quality (from above)?	_Yes _No /NA
	b.	Samples collected to indicate contamination (from	
	69	above)?	YesNo ANA
	c.	Elevation of groundwater surface at each monitoring well at each sampling event?	Yes No XNA
Sec	Did	G - Preparation, Evaluation, and Response (Part 265 owner/operator prepare an outline of a groundwater	
	qual	ity assessment program?	_Yes _No ANA
	a.	If yes, did program determine the following:	
		1. Whether hazardous waste or hazardous waste	, , , , , , , , , , , , , , , , , , ,
		constituents have entered the groundwater?	YesNo \(\frac{1}{2} NA
		2. Rate and extent of hazardous waste or	YesNo X NA
		hazardous waste constituent migration? 3. Concentrations of hazardous waste or hazardous	Ties — no the
		3. Concentrations of hazardous waste or hazardous waste constituents in groundwater?	YesNo \(\frac{1}{2}\) NA
		waste constituents in gloundwater:	
	b.	For each well, has owner/operator calculated the	
		arithmatic mean and variance, based on four replication	
		measurements for each sample, and compared the res	ults
		with initial background mean?	_Yes _No _NA
	c.	Has owner/operator submitted information documenting	ng
		any significant increase in comparisons for up-	1.0
		gradient wells (or decrease in pH)?	YesNo _KNA
	d.	If the comparisons for downgradient wells show a	
Ť		significant increase (or pH decrease), has the own	er/

operator obtained additional groundwater samples from

decre two, sampl	downgradient wells in which a significant ase was detected? (Samples must be split in and analyses must be obtained of all additional es to determine whether the significant erence was a result of lab error)		_no /na
	If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days? If analyses confirmed significant increase	14.5	_no Ana
2.	(or pH decrease), did owner/operator submit to the Executive Director within 15 days after notification (discussed above) a certified	Yes	_no Ana
3.	Did owner/operator implement the groundwater quality assessment program and, at a minimum, did he determine the following:		no
	 a. Rate and extent of migration of the hazardous waste constituents in the groundwater? b. Concentrations of the hazardous waste 	_Yes	_No ANA
4.	in the groundwater? Did owner/operator submit a report to the Executive Director containing the requests of the assessment outlined in No. 3 above within	Yes	no Ana
5.	15 days? Did owner/operator notify the Executive Director of reinstatement of indicator evaluation program upon finding that no		_NoA_NA
6.	hazardous waste or hazardous waste constituents had entered the groundwater? If owner/operator determined that hazardous waste or hazardous waste constituents entered the groundwater, did he either continue to make	_Yes	_no 21 na
	the determinations listed in No. 3 above on a quarterly basis until final closure or ground-water quality assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if ground		
7.	water quality assessment plan was implemented during post-closure? If any groundwater quality assessment program is implemented to satisfy No. 3 above prior to		_No AN
8.	If owner/operator does not monitor at least	_Yes	_no Kna
	annually to satisfy No. 3 above, does owner/ operator evaluate data on groundwater elevation		

	Obtained under No. 30 In Section Pabove		M
	to determine whether the requirements for		Ar .
	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 well to bring the system into compliance?	g	_no <u>na</u> na
Section	n H - Recordkeeping and Reporting (Part 265 only) (26	5.94)	
red	less owner/operator is monitoring to satisfy the quirements of Section 265.93(d)(4), does owner/erator:		***
	. 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? . 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? Does owner/operator inform the Executive Director about any parameters that exceed maximum contaminant levels listed in Appendix III? (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 Ana _no Ana _no Ana
	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 /nā
su	es owner/operator submit results of the groundwater rface elevations under Section 265.93(f), along with description of the response, if needed?	Yes	_no Ana

- 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 postclosure?

__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 __NoX_NA

P	art	

FINANCIAL REQUIREMENTS CHECKLIST

Sec	tion	A - Closure		
1.		acility required to provide financial assurance	 /	√no _n
	for	closure?	Yes ($+^{NO}$ $-^{NA}$
	a.	Type of financial assurance		
		Amount of closure costs		-
	_,	1. Date of most recent adjustment		
	c.		()	
		Expiration date of mechanism		_
		Is instrument adequate?	Yes	No N
		1		
				(*)
Sec	tion	B - Post-Closure		
•	7.4	incility required to provide financial engagement	,	
1.		acility required to provide financial assurance	V	NoN
	ior	post-closure care?	Vies '	NON
	_	Type of financial assurance Financial Test		
	a. b.			
	ь.	1. Date of most recent adjustment		
	_			
	c.	Effective date of mechanism April 1994	45	-
. 1		Is instrument adequate?	Nyon	_ non
	e.	is institutent adequater	Ares.	NON
Sec	rtion	C - Corrective Action		
<u> </u>	201011	0 0011001110 11011011		
1.	Is f	acility required to provide financial assurance for		
		ective action?		No N
	a.	Type of financial assurance financial Tes.		
	b.	Amount of closure costs		
		1. Date of most recent adjustment		-
	c.	Effective date of mechanism April, ARJ		_
		Expiration date of mechanism		
		Is instrument adequate?	/Yes	No N
		· ·		
Sec	ction	D - Liability Requirements		
1.	Is f	facility required to provide liability coverage for		
	sudd	len accidental occurrences?	Yes	No N
	a.	Type of assurance [] nan/al 7/5+		
	b.	Is amount at least \$1 million per occurrence, \$2		
			/ Yes	No N
	· c.	Effective date of mechanism	,_ -	

	d. Expiration date of mechanism	
2.	Is facility required to provide liability coverage	
	for non-sudden accidental occurrences?	YesNoNA
	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:1r



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,

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 mow 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

Date

Part 1

General Site Information

Facility Name: Address:	Kerr-Michel Chemical Corporation
	Columbus, Mississippi
I.D. Number: Contact: Title: Phone Number:	MSD990866329 John Getz Plant Manager
Type of Ownersh	ip:
Federal	StateCountyMunicipalPrivate
Facility Status	
Generator	TransporterTreatmentStorageDisposal
Regulatory Stat	
Interim Sta	Part B in Preparation
Principal Inspe Organization:	MS DECE Phone Number: 61-961-5141
Inspection Part	icipants:
Name Bruce Feranse John Getz Trang Helm	Manager RMCC
	•

Part _

GENERAL FACILITY CHECKLIST

Section .	A -	General	Facility	Standards

			V
1.	Does	facility have EPA Identification No.?	XYes _No _NA
	a.	If yes, EPA I.D. No. M & D 9 9 6 6 6 3 If no, explain.	29
2.	Has i	facility received hazardous waste from a foreign	Yes X_NoNA
	a.	If yes, has it filed a notice with the Regional Administrator?	YesNo 🗶 NA
Was	te Ana	alysis	
3.		facility maintain a copy of the waste analysis at the facility?	Xves _No _NA
	a.	If yes, does it include: (264.13) (265.13)	
	1	Parameters for which each waste will be analyzed?	YesNoNA
		2. Test methods used to test for these parameters?	Yes _No _NA 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?	YesNo \vec{VNA}
		5. (For offsite facilities) waste analyses that generators have agreed to supply?	YesNo VNA
		6. (For offsite facilities) procedures which are used to inspect and analyze each movement of	,
		hazardous waste, including:	9 0 0
		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.	Xyes _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)?	XYes _No _NA

	b.	1.	Artificial or natural barrier around facility (e.g., fence or fence and cliff)?	X Yes	No	NA
			Describe FENCE (Boards)			
			AND			
•		2.	Means to control entry through entrances (e.g.	,		
			attendant, television monitors, locked entranc	e,		
		22	controlled roadway access)?	Yes	No	NA
			Describe Guard			
				() () () () () () () () () ()		
Gen	eral	Inspe	ection Requirements (264.15) (265.15)			
5.	Does	the	owner/operator maintain a written schedule at		•	
•			lity for inspecting:			* *
	a.	Mon	itoring equipment?	√ Yes	No	NA
	b.		ety and emergency equipment?	Yes	— _{No}	-NA
			rity devices:	Yes	-No	NA
			rating and structural equipment?	Yes	No	NA
	e.	Тур	es of problems of equipment:	7		
		1.	Malfunction	, Yes	No	NA
			Operator error	Yes	No	NA
			Discharges	1 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.		Yes	_No	NA
		3.		Yes	_No	NA
		4.	Date and nature of repairs or remedial		**-	272
			action?		_	NA
		5.	Identification of potential problems?	Ies	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
Per	sonne	l Tr	mining (264.16) (265.16)			
_						
7.	reco	ords a	owner/operator maintain personnel training at the facility?	Yes	_No	NA
	Date	of i	most recent training: June 29,1992	_		_11
			\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \			

	A	
	How long are they kept?	
(a. If yes, do they include:	
2	 Job title and written job description of each position? 	Yes _No _NA
	 Description of type and amount of training? Records of training given to facility 	XYes _No _NA
(personnel?	XYes _No _NA
Req	- uirements for Ignitable, Reactive, or Incompatible Wast	e
	(264.17) (265.17)	
8.	Does facility handle ignitable or reactive wastes?	_Yes XNo _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.,	
	<pre>from heat-producing chemical reactions), and radiant heat?</pre>	
	radiant heat?	
	1. If yes, use narrative explanation sheet to	
	describe separation and confinement procedur	es.
	2. If no, use narrative explanation sheet to	
	describe sources of ignition or reaction.	
	b. Are smoking and open flames confined to specifica	11v
	designated locations?	Yes _No _NA
	c. Are "No Smoking" signs posted in hazardous areas?	YesNoNA
	d. Are precautions documented (Part 264 only)?	YesNoNA
9.	Check containers	
	a. Are containers leaking or corroding?	_Yes _No NA
	b. Is there evidence of heat generation from	vaa vaiVva
	incompatible wastes?	_Yes _No XNA
Sec	tion 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.	,

	Is the facility equipped with: (264.32) (265.32)			
	a. Internal communication or alarm system?	Yes	_No _1	NA
	1. Is it easily accessible in case of emergency?	Yes	No!	NA
	b. Telephone or two-way radio to call emergency response personnel?	Xves	_No _1	NA
	c. Portable fire extinguishers, fire control equipment spill control equipment, and decontamination equipment?		_No _1	AN
	d. Water of adequate volume of hoses, sprinkers, or water spray system?	XYes	No1	NA
	1. Describe source of water City WATE	ST.		
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 hazar waste handled and associated hazards, places where faci personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (264.37) (265.37)	dous lity	No1	NA
5.	In the case that more than one police or fire departmen			
	might respond, is there a designated primary authority? (264.37) (265.37)	t Yes	_no 🗴	NA
	might respond, is there a designated primary authority?	Yes	_no 🗴	NA
6.	might respond, is there a designated primary authority? (264.37) (265.37)	Yes	No	NA
6.	might respond, is there a designated primary authority? (264.37) (265.37) a. If yes, name primary authority Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergen response contractors, and equipment suppliers?.	Yes		NA
	might respond, is there a designated primary authority? (264.37) (265.37) a. If yes, name primary authority Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergence response contractors, and equipment suppliers? (264.37) (265.37)	Yes Yes	No	NA

	Sec	tion C - Contingency Plan and Emergency Procedures	
3	1.	Is a contingency plan maintained at the facility? (264.53) (265.53)	YesNoNA
		a. If yes, is it a revised SPCC Plan?	YesNoNA
		b. Does contingency plan include: (264.52) (265.52)	
		 Arrangements with local emergency response organizations? 	XYesNoNA
		2. Emergency coordinator's names, phone numbers and addresses?	XYes _No _NA
		3. List of all emergency equipment at facility and descriptions of equipment?4. Evacuation plan for facility personnel?	XYesNoNA XYesNoNA
	2.	Is there an emergency coordinator on site or on call at all times? (264.55) (265.55)	Yes _No _NA
	Sec	tion D - Manifest System, Recordkeeping, and Reporting	
	1.	Does facility receive waste from offsite? (264.71) (265.71)	_Yes XnoNA
		a. If yes, does the owner/operator retain copies of all manifests?	
		 Are the manifests signed and dated and returned to the generator? Is a signed copy given to the transporter? 	Yes No XNA Yes No XNA
	2.	Does the facility receive any waste from a rail or water (bulk shipment) transporter? (264.71) (265.71)	Yes _NoNA
		a. If yes, is it accompanied by a shipping paper?	_Yes _No XNA
		1. Does the owner/operator sign and date the shipping paper and return a copy to the generator?	YesNo XNA YesNo XNA
		2. Is a signed copy given to the transporter?	Yes No XNA
	3.	Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? (264.72) (265.72)	_Yes \(\sum_NA
		a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter?	_Yes _No XNA
		1. If no, has Regional Administrator been notified?	Yes No XNA

	_					
4.			owner/operator keep a written operating the facility? (264.73) (265.73)	Yes	No .	NA
	a.	If ye	es, does it include:	• (
		1.	Description and quantity of each hazardous			J
		2.	waste received? Methods and dates of treatment, storage, and	Yes	No \	X_NA
			disposal?	Yes	_No	X na
		3.	Location and quantity of each hazardous waste	(8)		2
		Δ.	at each location? Cross-references to manifests/shipping	Yes	_No	HNA
		4.	papers?	Yes	No	XNA
		5.	Records and results of waste analyses?	Yes	No	Y NA
		6.	Report of incidents involving implementation		<u>-</u>	N
			of the contingency plan?	_Yes	No	X NA
			Records and results of required inspections?	Yes	No	X-NA
		8.	Monitoring, testing, and analytical data, for groundwater required by Subpart F?	Yan	No	V NA
		9.	Closure cost estimates and, for disposal	— ₁₆₈	_No	4."
			facilities, post-closure cost estimates			12
			(Part 264)?	Yes	No	X NA
		10.	Notices of generators as specified in Section			
(A			264.12(b) (Part 264)?	Yes	No	AWA_
	b.	Does	facility have copy of permit on site?	Yes	No	NA
				4-00		
5.	Does	the f	facility submit a biennial report by March 1	. ,		
	ever	y ever	n-numbered year? (264.75) (265.75)	Yes	_No	—NA
	a.	If ye	es, do reports contain the following			
		_	mation:			
		1.	EPA I.D. number?	Yes	No	NA
			Date and year covered by report?	Yes	-No	—NA
			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	Large	60 NA	
		7	estiamtes? For TSD generators, description of efforts	Yes	no	NA
87.		•	to reduce volume/toxicity of waste generated,			
			and actual comparisons with previous year?	LYes	No	NA
		8.	Certification signed by owner/operator?	Yes		
6.	Has '	the fa	cility received any waste (that does not come	•		
-			small generator exclusion) not accompanied			
			est? (264.76) (265.76)	Yes	XNo	NA
		T.S	a baa ba asharaa		•	
	a.		es, has he submitted an unmanifested waste et to the Executive Director?	Yes	No.	XNA
		rebor	DITACTOLI	162	110	A

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

XYes _No _NA

Part	:

LAND DISPOSAL RESTRICTIONS CHECKLIST

Section A - General

1.	Are hazardous wastes land-disposed on site?	Yes XNoNA
	a. If yes, are one or more of the following circumstantrue:	ces
	 Granted extension from effective date pursuant to Section 268.5? 	YesNo XNA
	2. Granted exemption from a prohibition pursuant to a petition under Section 268.6?	YesNo XNA
	 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? 4. Facility is a small quantity generator of	YesNo XNA
	less than 100 kg of hazardous waste per month?	YesNo _XNA YesNo _XNA
	5. Wastes not yet prohibited by Part 268?	YesNo XNA
2.	Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal?	YesNoNA
3.	Are there active surface impoundments used for treatment of hazardous wastes?	: Yes XNoNA
	a. If yes, does the unit's design and operation meet the requirements set forth in Section 268.4?	_Yes _No XNA
4.	Has the facility sought exemption from any prohibition under Subpart C of Section 268 for the disposal of a restricted hazardous waste?	_Yes X_NoNA
	a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis comprehensive environmental characterization of unit	it
	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)?	YesNoNA
	b. If yes, does the restricted waste required treatment?	YesNo^*NA

through F005 (solvent wastes)? (268.10) 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)? 2. The solvent waste is generated from a CERCLA response corrective action? 3. The solvent waste is a solvent—water mixture, solvent—containing sludge, or solvent—containing sludge, or solvent—containing less than 1 percent total F001 through F005 solvent constituents. b. If no, have any of these restricted wastes began land—disposed (except in an injection well) since November 8, 1986? 7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin—containing wastes)? a. If yes, do any of the following conditions apply: 1. Wastes are treated to meet standards of Subpart D of Section 268? 2. Wastes are disposed of at a facility that has been granted a petition? 3. An extension has been granted? 4 yes No NA NA Yes No NA NA Yes No NA Yes		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 XNo	na
1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? 2. The solvent waste is generated from a CERCLA response corrective action? 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. b. If no, have any of these restricted wastes began land-disposed (except in an injection well) since November 8, 1986? 7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? a. If yes, do any of the following conditions apply: 1. Wastes are treated to meet standards of Subpart D of Section 268? 2. Wastes are disposed of at a facility that has been granted a petition? 3. An extension has been granted? 4. Wes No NA No NA Yes No NA **No NA	6.	Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? (268.10)	NA
quantity generator (not more than 1000 kg/month)? 2. The solvent waste is generated from a CERCLA response corrective action? 3. The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-containinated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. b. If no, have any of these restricted wastes began land-disposed (except in an injection well) since November 8, 1986? 7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? a. If yes, do any of the following conditions apply: 1. Wastes are treated to meet standards of Subpart D of Section 268? 2. Wastes are disposed of at a facility that has been granted a petition? 3. An extension has been granted? 4 yes No NA Yes NA Yes No NA Yes No NA Yes NA Yes NA Yes NA Yes NA Yes NA Yes NA		a. If yes, do any of the following conditions apply:	
action) containing less than 1 percent total F001 through F005 solvent constituents. D. If no, have any of these restricted wastes began land-disposed (except in an injection well) since November 8, 1986? The land-disposed (except in an injection well) since November 8, 1986? The land-disposed (except in an injection well) since November 8, 1986? The land-disposed (except in an injection well) since Yes No NA Yes No NA The land-disposed (except in an injection well) since Yes No NA Yes No NA The land-disposed Yes No NA If yes, do any of the following conditions apply: 1. Wastes are treated to meet standards of Subpart Yes No NA Deen granted a petition? The land-disposed Yes No NA The no, were these restricted wastes land disposed after November 8, 1988? The land-disposed Yes No NA Yes No NA Yes No NA The land-disposed NA Yes No NA Yes No NA The land-disposed NA T		quantity generator (not more than 1000 kg/month)? 2. The solvent waste is generated from a CERCLA response corrective action? 3. The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-	Tna Tna
land-disposed (except in an injection well) since November 8, 1986? 7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? a. If yes, do any of the following conditions apply: 1. Wastes are treated to meet standards of Subpart D of Section 268? 2. Wastes are disposed of at a facility that has been granted a petition? 3. An extension has been granted? 4. Yes No NA Are restricted wastes being treated? 4. Yes No NA Are restricted wastes being treated? 4. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste		action) containing less than 1 percent total	_na
FO21, FO23, FO26, FO27, or FO28 (dioxin-containing wastes)? a. If yes, do any of the following conditions apply: 1. Wastes are treated to meet standards of Subpart D of Section 268? 2. Wastes are disposed of at a facility that has been granted a petition? 3. An extension has been granted? 4. Yes No NA Are restricted wastes being treated? Yes No NA Yes No NA Yes No NA Yes No NA Are restricted wastes being treated? Yes No NA		land-disposed (except in an injection well) since	↓ na
1. Wastes are treated to meet standards of Subpart D of Section 268? 2. Wastes are disposed of at a facility that has been granted a petition? 3. An extension has been granted? 4. Yes No NA Are restricted wastes land disposed after November 8, 1988? Yes No NA Yes No NA Yes No NA Yes No NA **The November 8, 1988?* **The November 8 No NA **The Novem	7.	F021, F023, F026, F027, or F028 (dioxin-containing	NA
D of Section 268? 2. Wastes are disposed of at a facility that has been granted a petition? 3. An extension has been granted? 4. If no, were these restricted wastes land disposed after November 8, 1988? 8. Are restricted wastes being treated? 4. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste"	80	a. If yes, do any of the following conditions apply:	
b. If no, were these restricted wastes land disposed after November 8, 1988? 8. Are restricted wastes being treated? Yes No NF a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste		D of Section 268?YesNo 2. Wastes are disposed of at a facility that has been granted a petition?YesNo	NA
after November 8, 1988? 8. Are restricted wastes being treated? a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste			⊀ ^{NA}
a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste			+NA
constituents exceeded the "Constituent in Waste	8.	Are restricted wastes being treated? Yes YNO	NA
		constituents exceeded the "Constituent in Waste	JNA

Section B - Generator Compliance

1. Waste I	dentification	
a. Do	es the generator handle the following wastes:	
1	. Solvent wastes	
	(i) F001, F002, F004, or F005 (ii) F003	Yes _NoNA YesNoNA
	F003 wastestream (listed solely for ignitability	- T
	ixed with a non-restricted solid or hazardous wa	ste,
	he resultant mixture exhibit the ignitability	
charac	teristic?	_Yes _No _NA
offic wast prev misc iden	ndix A is intended to assist the inspector and exial in determining whether the facility is general, if such wastes were not identified by the faciously. If you are concerned that F-solvent was lassified or mislabeled, turn to Appendix A-1. The tifying potentially misclassified F-solvents, Appends a list of corresponding F and U wastes.	rating F-solvent cility tes may be To assist in
2	. Dioxin wates (F020-F023, F026-F028)	_Yes \(\sum_NA
3	. Potential California List Wastes	
	(see Appendix C)	YesNoNA
	(i) D002	Yes \(\frac{}{\text{NO}}\) NA
	(ii) D004-D011	Yes No NA
	(iii) Any other waste characterized by high	—, —
	concentrations of halogenated organic	
	constituents (HOCs), metals, or	S /
	cyanides?	Yes _NoNA
	(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 Yno N
4	First Third Wastes (See MHWMR 268.10)	Yes KNO NA
•	. Second Third Wastes (See MHWMR 268.11)	Yes √NoN
		—168 - 10 —11
	. (Reserved)	
	(i) Are any of the above "soft hammer"	,
	wastes? (See Appendices D & E)	Yes _NoN
2. BDAT Tre	eatability Group - Treatment Standards Identific	ation
a. Do	es the generator mix restricted wastes with	
	fferent treatment standards for constituents	1
of	concern?	Yes Tho NA

b. If yes, did the generator select the most stringent treatment standard for the constituent of concern [Section 268.41(b)]? 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)? 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)]? Pirst 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)	<u>⊠</u> na
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)? 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)]? Pirst 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)	
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)? 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)]? 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)	
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 Ye	_ NA
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)]? 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)	<u>∕</u> na
1. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids)	
wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids)	
[Section 268.7(a)]? Yes No	<u>/</u> 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	<u>K</u> na
Waste Analysis	
a. Did the generator determine whether the waste exceeds treatment standards based on Section 268.7(a):	
1. Knowledge of wastesYesNo	√ na
(i) List wastes for which "applied knowledge" was used:	

з.

TCLP	ri telija Tar e jaz je i	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	<u>X</u> na
	If yes, list:		. 8	
Total	. waste analysis	Yes	No	<u> </u>
				· · · · · · · · · · · · · · · · · · ·
			8	
of te	esting, and attach test results.	?		
Note	which wastes were subjected to which test	.s:		
		-		
varia	ation of waste composition/generation for			
analy	rsis when a process or wastestream changed	i		
		Yes	No	<u>X</u> NA
tabili	ity group treatment standards upon			
those	e that exceeded standards:	_		
	(ii) (ii) (iii) Total If fi basis If de analy of te Note Note varia appli Were analy [Sect 265.]	(i) List wastes for which "TCLP" was used: \[\text{No boxeles for Which TCLP" was used: } \] (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? If yes, list:	(i) List wastes for which "TCLP" was used: No wastes Paled the TCLP	(i) List wastes for which "TCLP" was used: No works Izled 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? If yes, list: Total waste analysis Yes No 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) Were wates tested using TCLP or total constituent analysis when a process or wastestream changed [Section 264.13(a)(3)(i))? Yes No the restricted wastes exceed applicable tability group treatment standards upon ration [Section 268.7(a)(1)]?

b.

		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]	yesnona
		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?	YesNo X_NA
4.	Mana	gement	
	a.	Onsite management	3
		1. Were restricted wastes managed onsite?	_Yes XNo _NA
		2. For wastes that exceed treatment standards, was treatment in regulated units, storage for	
	888	<pre>greater than 90 days, and/or disposal conducted?</pre>	_Yes _No /NA
	•	If yes, TSDF checklist must be completed.	
	b.	Offsite Management	
		 If restricted wastes exceed treatment standard 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	
	9	2. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:	e e
		(i) EPA hazardous waste I.D. number?(ii) Corresponding treatment standard?	_Yes _No XNA Yes No NA

	IIII Wastfank number	Vos	No. 1	/222
	(iii) Manifest number	res	No /	₹u₩
	(iv) Certification regarding waste and that it meets treatment standards?	Yes	No _	/NA
	entify land disposal facilities receiving the T certified wastes			
	8			
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		NA
	(iii) All applicable prohibitions?	Yes	NO -	TNA
	(iv) The manifest number?	-Yes	NO -	TNA
	(v) The date the wastes are subject to	—, res	~-	+***
	prohibitions?	Yes	No	NA
	(vi) Does generator keep records of all	_:-		+
	notifications/certifications send to			1
	offsite facilities?	Vec	No	NA
	Identify TSDFs receiving any prohibited waste	 		
	subject to any exemptions and variances:			
4.	If handler generates a "soft hammer" waste, do the generator send with each "soft hammer" was shipment to a TSDF and retain copies of, a no- that includes [268.7(a)(4)]:	ste		
	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	Ė		
	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 demonstration and certifications for each "soft-hammer waste destined to be disposed in landfil or surface impoundment to the Regional Administrator prior to the shipment of waste description."	ed" l aste	_ =	
		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)((a)(4)]?	3)-	No _	_NA
	(iv)	Has the generator retained copies of all Section 268.8 certifications sent to the TSDF [Section 268.7(a)(6)]		No _	NA
	.(v)	Did the generator submit the demonstration to the receiving facility upon the inition shipment of the waste [Section 268.8(a)((a)(4))?	al (3)-	No .	NA
	(vi)	If the Regional Administrator has invalid the certification, has the generator ceasing shipment of the waste and do records indi- that the generator has informed all reco- facilities of the invalidation [Section	ased licate		
		268.8(b)(3)]?	Yes	_No	-NA
5.	Storage of Proh	ibited Waste			
	a. Were prohi	bited wastes stored for greater than 90			
	days?		Yes	No	_NA
		s facility operating as a TSD under atus or final permit [Section			
	262.34(b)]	?	Yes	No	→ ^{NA}
	If yes, TS	OF Checklist must be completed.			
6.		RCRA 264/265 Exempt Units or Processes furnaces, distillation units, wastewater , etc.)			
		ment residuals generated from RCRA cempt units or processes?	Yes	No	NA

	If yes	s, list type of treatment unit and processes	12 4	•	
	/				
	If yes	s, TSDF checklist must be completed.			
ecti	on C - Tre	eatment, Storage & Disposal Requirements			
L. G	eneral				
, ii		the facility conduct waste analysis (total and on-site or through a commercial laboratory?			
;	b. Descr.	ibe the frequency of sampling conducted by the ity.	,		
		30 4			
2. T	reatment	Facilities			
	analy	he treatment facility revised its waste sis plan [Section 268.7(b)] to meet the rements 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	S.		
		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)]?		No .	NA
		Is the treatment facility testing the pH of California waste residues?	Yes	No	NA 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)]		No	, ia

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 XNA

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 XNA

pb. Are all containers clearly marked to identify content and date(s) entering storage [Section 268.50(a)(2)]?

_Yes _No \(\sqrt{NA} \)

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

	to facilitate proper recovery, treatment, or disposa	11: —	
			
rea	tment in Surface Impoundments (Section 268.4)		٠
a.	Are prohibited wastes placed in surface impoundments for treatment?	Yes _	_No
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
c.	Did the facility submit a certification of		
	compliance with minimum technology and groundwater		
	monitoring requirements, and the waste analysis	Voc	No
	plan to the Agency [Section 268.4(a)(4)]?	_Yes	_,,,
d.	Have the minimum technology requirements been	\$ ·	•• -
	met [Section 268.4(a)(4)]?	Yes .	^{NO}
65			
	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
e.	Have the Subpart F groundwater monitoring		
	requirements been met [Section 268.4(a)(3)]?	Yes	^{No}
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	Yes	No
	268.4(a)(2)]?		—"
g.	Did the hazardous waste residue (sludge or liquid)		
	exceed the treatment standards or prohibition	•	
	levels?	Yes	NC
h.	Provide the frequency of analyses conducted on treatment residues:	_	
		-	

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
	 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	s	,
1.	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:	-		
Othe	er Treatment			
a.	Does the facility operate treatment units (regulate or exempt) (not including surface impoundments)?	ed Yes	No	NA
b.	Describe the treatment processes, including exempt processes:	_		
c.	Does the facility treat soft-hammered wastes?	- - Yes	a No	TNA
٠.	non one rectification of the number of adoces.			

6.

	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)]?		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)]?		No	,
d.	waste from waste	the facility, in accordance with an acceptable analysis plan, verify that the residue extract all treatment processes for the restricted as are less than treatment standards or ibition levels [Section 268.7(c)(2)]?	t ⁱ =	No	1
e.		ribe frequency of testing of treatment residual		g ,	
f.		dilution used as a substitute for treatment tion 268.3]?	Yes	No	√ NA
g.	of w	all notifications, certifications, and results aste analyses kept in the operating record tion 264.73(b) or Section 265.73(b)]?	Yes	No	√NA
h.	comp. mani avai or t: stand trea	notices provided to land disposal facilities lete with Waste Number, treatment standard, fest number, and analytical data (where lable) submitted for each shipment of waste reatment residual that meets the treatment dard stating that waste has been treated to the theorems of the treatment description.			1
i.	If the management of the manag	7(b)(4) and (5) and Section 268.8(c)(1)}? The waste or treatment residue will be further ged at another storage or treatment facility, the treatment facility complied with the 7(a) notification and certification requirement		No	NA
		icable to generators [Section 268.7(b)(6)]?		_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 ANA
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)]?	YesNo{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 TNA
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 petitic [268.6] were disposed, does facility have generator notices [268.7(a)(3)] and records of disposal? [Section 264.73(b) or Section 265.73(b)]	
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.		he owner/operator is disposing of a soft- er waste, is he maintaining the generators	39	
	and	treaters (if applicable) notices and		/
		ifications [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

ě

Part

GENERATOR'S CHECKLIST

Sec	tion 1	A -	EPA Identification No.		
1.	Does	gen	erator have EPA I.D. No.? (262.12)	XYes _	_NoN
	a.	If	yes, EPA I.D. No. 996866329	•	
Sec	tion 1	в –	Manifest		
1.	Does	gen	erator ship waste offsite? (262.20)	Yes _	_NoN
	a.	If	no, do not fill out Sections B and D.		•
	b.		yes, identify primary offiste facility(s). HEMICAL WASSE MENT (B.		
2.	Does	gen	merator use manifest? (262.20)	Myes _	_NoN
	a.		no, is generator a small quantity generator enerating between 100 and 1000 kg/month)?	Yes _	_no <u>X</u> n
		1.	If yes, does generator indicate this when sending waste to a TSD facility?	Yes_	_no
	b.		yes, does manifest include the following formation?	_Yes_	_no _n
			Manifest document No. Generator's name, mailing address, telephone	X _{Yes}	_no _n
			number	Yes -	_No _N
		100	Generator EPA I.D. No.	Yves -	NON NON
		5.	Transporter Name(s) and EPA I.D. No.(s) a. Facility name, address, and EPA I.D. No.		NON
		Э.	 b. Alternate facility name, address, and EPA I.D. No. 		NoN
			c. Instructions to return to generator if undeliverable	73	 non
		6	name, quantity (weight or vol.), containers		
			(type and number)	XYes .	NoN
		7	handling instructions, telephone No.)	Y es	NoN
		8	. Is the following certification on each	X Yes	No N

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.	2. Who signed for generator?	Yes Yes	No	NA NA
		Name Arthory Helms Title Assist Man		•	
	b.	 Did generator obtain handwritten signature and date of acceptance from initial transporter? 	Yes	No	NA
		2. Who signed and dated for transporter?	¥es XYes	No	NA
		Name World 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			
	e.	owner/operator signature and date of acceptance? Does generator retain copies for 3 years?	XYes XYes	_No	-NA
			<i>,</i> .		
Sec	tion	C - Hazardous Waste Determination			
1.		s generator generate solid waste(s) listed in Subpar List of Hazardous Waste)? (261.30)	t _ <u>X</u> Yes	No	NA
	a.	If yes, list waste and quantities (include EPA Hazardous Waste No.) F63			
2.	exh	s generator solid waste(s) listed in Subpart C that ibit hazadous characteristics? (corrosivity, itability, 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 testinor by applying knowledge of processes?	ng ——		
		 If determined by testing, did generator use test methods in Part 261, Subpart C (or 			y.
		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
	 If no, list wastes and quantities deemed nonhazardous or processes from which non- hazardous waste was produced (use additional sheet if necessary). 			
Sec	tion D - Pretransport Requirements	22		
DEC	cton b - rectamport Requirements			
1.	Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30)	XYes	No	NA
2.	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?	XYes	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: <u>HAZARDOUS WASTE</u> - Federal Law Prohibits Improper Disposal. If found, contact the nearest polic or public safety authority or the U.S. Environmental Protection Agency.	;y		
	Generator name(s) and address(es)	<u> </u>		
	Manifest document No.			•
6.	Does generator have placards to offer to transporters? (262.33)	Xyes	No	NA

7. Accumu	lation time: (262.34)		
	are containers used to temporarily store waste before transport?		_NA
	 If yes, is each container clearly dated: Also, fill out rest of No. 7 (accum. time) 		_NA
b. 1	Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) If yes, with what frequency?	Yes _No _	_NA
2	. If yes, with what frequency?	\times Yes _No _	_NA
0	ones 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)		(na
NOTE: If	tanks are used, fill out checklist for tanks.		
	are the containers labeled and marked in accordance with Section D-3, D-4, and D-5 of this form?		_NA
	generator accumulates waste on site, fill out ecklist for General Facilities, Subparts C and D.		•
·	Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.)	Yes _No _	_NA
	be storage area. Use photos and narrative nation sheet.	,	
Section E	- Recordkeeping and Records (262.40)		
1. Does g	generator keep the following reports for 3 years?		
	Manifests and signed copies from	Yes No No	AN_ AN_
	Biennial Reports Exception reports	Yes No	NA
	Test results	Yes No	_NA
2. Where	are the records kept (at facility or elsewhere)?		
	Anthony Helms Title Act P	ant Mer	•
Name _	Title Man		

Section F - Special Conditions

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

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

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

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? b. Containers properly labeled? 4. If > 55 gallons accumulated, has generator complied

_Yes __No __NA

with 262.34(c)(2)?

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? Yes No NA Yes No NA

Yes No NA

d. Area inspected?

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

Sec	tion A	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
		 Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand. Monofill has at least one liner for which there is no evidence of leaking. Monofill is located, designed, and operated to ensure that no migration of constituents into ground or surface water occurs. 			
	e. f.	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)? Is impoundment surrounded by dikes (Part 264)?	Yes Yes	No	NA NA
					1,
Sec	tion	B - Operating Requirements			
1.		owner/operator maintain at least 60 cm (2 ft) of board (Part 265)? (265.222)			
2.	engi	owner/operator have certification from a qualified neer that alternate design features will prevent topping? (Part 265) (265.222)	_Yes	No .	NA

Section C - Containment Systems

1.	Do all dikes have a protective cover such as grass,			1
	shale or rock? (Part 265) (265.223)	Yes	No	NA
				T
Sec	tion D - Waste Analysis and Trial Tests			
1.	Will the surface impoundment be used to: (265.225)			
	a. Chemically treat a hazardous waste which is			1
	substantially different from wastes previously			1
	treated in the impoundment? (Part 265)	Yes	No	NA
	b. Chemically treat hazardous waste with a		" ·	+ -
	substantially different process than any			1
	previously used in that impoundment?	Yes	No	lara
	previously used in char impoundments	-168 -	_NO -	-INA
2.	If the answer in #1 was yes to any questions, has the			1
۷.	owner/operator:			1
	Owner, operator.			
	a. Conducted waste analysis or trial treatment tests?	Vec	No	NA
	b. Obtained written, documented information on			۳"
	treatment of similar wastes under similar			1
	operating conditions?	Yes	No	NA
				+"``
				1
Sec	ction E - Inspections and Monitoring			1
				ł
1.	Does the owner/operator:			
	a. Inspect the freeboard at least one each operating			
	day? (265.226)	Yes	_No	NA
	 Inspect the surface impoundment including dikes 			1
	and vegetation at least once per week and after			
	storms? (264.226) (265.226)	Yes	_No	_NA
				1
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
Co.	ction F - Emergency Repairs, Contingency Plans (Part 264)	(264.	2271	
<u>36(</u>	ction r - Emergency Repairs; Contingency Frank (Fart 204)	(204)	,	1
1.	Does facility have a contingency plan?	Yes	No	NA
				1
	a. If yes, does plan stipulate that impoundment be			1
	removed from service under the following conditions	ā:		1
			10	
	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 remoimpoundment from service, including:	ving		
		 Shutting off flow into impoundment? Containing any surface leakage? Stopping the leak? Notifying Regional Administrator of problems in writing if leaks cannot be contained? 	_Yes _Yes _Yes _Yes	No No	NA NA NA NA
*	c.	If impoundment was removed from service, did owner, operator take the necessary precautions to rectify problems before restoring impoundment to service?		No	_NA
	đ.	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 NA
Sec	tion	G - Closure and Post-Closure (264.228) (265.228)			
1.	Is a	closure plan retained at the facility?	Yes	_No	Kna
2.	At c	losure, did owner/operator:			
	a. b. c. d.	Remove liner (Part 265)? Remove underlying and surrounding contaminated soil?	Yes Yes Yes Yes	No No No	NA NA NA NA
		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)?	ent Yes	No	NA
3.	If r	egulated under Part 264, has owner/operator: (264.2	228)		
	a.	Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment and managed them as hazardous waste?		No	NA
	b. c.	Eliminated free liquids by removing or solidifying remaining wastes or waste residues? Stabilized remaining wastes to a bearing capacity	Yes	No :	NA
	d.	sufficient to support final cover? Covered the impoundment with final cover?	Yes Yes	No	NA NA
4.		owner/operator leave any residuals in place at ure (Part 264)? (264.228)	Yes	No	NA

5.	In post-closure, does owner/operator maintain integrity of cover and groundwater monitoring system, and prevent runon and runoff? (264.228) (265.228)		No _	NA
Sec	tion H - Ignitable and Reactive Wastes (264.229) (265.2	29)		
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
	ction I - Incompatible Wastes (264.230) (265.230)			.
1.	Are incompatible wastes placed in the impoundment?	Yes	No	XNA

.

Pa	art	

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)
	 At least one upgradient/background well? At least three downgradient wells? 	Yes _No _NA 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
0	tion B - Sampling and Analysis (Part 264)	
Sec		
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))	XYes _No _NA
	a. If yes, does this plan include procedures and techniques for:	
	 Sample collection? Sample preservation? Analytical procedures? Chain-of-custody control? Determining the groundwater surface 	Yes No NA
ř	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?	XYesNoNA

Section C - Detection Monitoring Program (264.98)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases?	_Yes _No \textsup NA
a. If yes, are the following components included in the system:	
1. Background values?	YesNo \(\int NA
 Determination of groundwater flow rate and direction annually? (264.98(e)) 	YesNoYNA
 Determination of statistically significant increases over background concentrations at 	, 7
each well? (264.98(f))4. If there was a statistically significant	YesNo /_NA
increase indicated, did the facility notify the Executive Director per 264.98(g)(1)? 5. Did facility attempt to demonstrate an	_Yes _No \(\frac{\lambda}{NA}\)
apparent increase was not caused by a regula unit per MHWMR 264.98(g)(6)?	ted _Yes _No \(NA
6. Is all information contained in the facility operating record?	
1. Does the facility operate a compliance monitoring program?a. If yes, does the facility:	YesNo \(\sum_{NA} \)
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	Yes No X NA
at least semi-annually? (264.99(f)) 3. Determine whether there is statistically	_Yes _No XNA
significant evidence of increased contaminat at each monitoring well?	ion Yes No NA
4. If an increase was indicated, did facility notify the Executive Director?	YesNo XNA
5. Analyze samples for constituents listed in Appendix IX of Part 264 at least annually?	YesNo XNA
6. Record all information in the operating record?	_Yes _No $\frac{\lambda}{NA}$
Section E - Corrective Action Program (Part 264 only) (2	64.100)
1. Does facility follow a corrective action program that meets the facility's permit requirements?	Yes No NA
The faulty is in the process of	F 85

Section F - Sampling and Analysis (Part 265)

1.		the facility developed and followed a groundwater	1	A.
	samp	ling and analysis plan?	Yes	$-^{NO}$ NA
	a.	If yes, does the plan include procedures and		
		techniques for:		
		1. Sample collection?	Yes	$\underline{\hspace{0.1cm}}$
		2. Sample preservation?	Yes	No YNA
18		3. Analytical procedure?	Yes	No XNA
		4. Chain-of-custody control?	Yes	_No ANA
2.	Has	the owner/operator established initial background		
	1.4	entrations or values of all parameters specified in		•
	265.	92(b)?	Yes	_No ANA
	a.	Samples collected to establish background quality		•
		(from above)?	Yes	_No NA
	b.	Samples collected to indicate contamination (from above)?		_no Ina
	c.	Elevation of groundwater surface at each monitoring	3	<u>.</u>
		well at each sampling event?	Yes	_no <u>X</u> na
			,	
Sec	tion	G - Preparation, Evaluation, and Response (Part 265	only)	(265.93)
1.	Did	owner/operator prepare an outline of a groundwater		
	qual	ity assessment program?	Yes	_no Xna
	a.	If yes, did program determine the following:		
		1. Whether hazardous waste or hazardous waste		.,
		constituents have entered the groundwater?	Yes	No XNA
		Rate and extent of hazardous waste or		١.
		hazardous waste constituent migration?	Yes	_No ANA
		3. Concentrations of hazardous waste or hazardous	5)
		waste constituents in groundwater?	Yes	No ANA
	b.	For each well, has owner/operator calculated the		•
		arithmatic mean and variance, based on four replica	ate	
		measurements for each sample, and compared the resu		
		with initial background mean?		No p_NA
	c.	Has owner/operator submitted information documenting		•
		any significant increase in comparisons for up-	- I 30	
		gradient wells (or decrease in pH)?	Yes	No ANA
	đ.	If the comparisons for downgradient wells show a		/ ~
	٠.	significant increase (or pH decrease), has the owner	r/	
		operator obtained additional groundwater samples fr		

decre two, sampl	e downgradient wells in which a significant ease was detected? (Samples must be split in and analyses must be obtained of all additional es to determine whether the significant		25	1
diffe	erence 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? If analyses confirmed significant increase	_Yes	No	NA
2.	(or pH decrease), did owner/operator submit to			1
	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	_		7
	quality assessment program and, at a minimum, did he determine the following:	_Yes	No_	NA
	a. Rate and extent of migration of the	•		1
	hazardous waste constituents in the groundwater?	Yes	No	NA
	b. Concentrations of the hazardous waste	_162	NO .	┦"^
	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 prior to post-closure care, or cease to make			
Ş	water quality assessment plan was implemented			
7	during post-closure? If any groundwater quality assessment program	_res	No	NA
7.	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
Sec	tion 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 	_Yes	No .	NA
	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	_Yes	No	NA
	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, includin required evaluationg for these parameters under Section 265.93(b)?	_	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 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 postclosure?

__Yes __No __NA

(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?

P	art	

FINANCIAL REQUIREMENTS CHECKLIST

Sec	tion A - Closure			
1.	Is facility required to provide financial assurance for closure?	Yes	<u>X</u> no _n	12
	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 1	11
			<u> </u>	•
Sec	tion B - Post-Closure			
1.	Is facility required to provide financial assurance			
	for post-closure care?	Yes	_No _N	12
	a. Type of financial assurance Figure 1765			
	b. Amount of closure costs 4429 900		-	
	1. Date of most recent adjustment		_	
	c. Effective date of mechanism April 1992		-	
	d. Expiration date of mechanism Accord 1993	\$	_	
•	e. Is instrument adequate?	XYes	NoN	17
Sec	tion C - Corrective Action			
•	To familiar magnined to muchida financia			
1.	Is facility required to provide financial assurance for corrective action?	Yes	_No_N	12
		4	— —	
	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 1992		_	
	d. Expiration date of mechanism Nov. 1,1943			
	e. Is instrument adequate?	∠ Yes	NoN	7
Sec	tion D - Liability Requirements			
1.	Is facility required to provide liability coverage for sudden accidental occurrences?	$\chi_{\mathtt{Yes}}$	NoN	A
	F. (1		—··· —··	
	b. Is amount at least \$1 million per occurrence, \$2		¥0	
	million annual aggregate?	Xv	NoN	
	c. Effective date of mechanism April 1992	Yes	NON	A
	•			

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	PO Box 268859
Columbus, MS 39701	Oklahoma City, OK 731268859

Telecommunications

	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	
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	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		10/27/1992	
1696	Tronox, LLC	Official Site Name	04/10/2006	- 1, - 1, - 1, - 1, - 1, - 1, - 1, - 1,
MSP090021	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	10/11/1994	10/10/1999
	Kerr McGee Chemical Corporation, Columbus	Water-Pretreatment	08/23/2000	07/31/2005
1137090021	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	
Air	SM	06/06/1997	
Hazardous Waste	Large Quantity Generator	04/01/1997	
Hazardous Waste	TSD - Not Classified	06/11/2001	
Water	PT CIU	10/11/1994	
Water	PT CIU - Timber Products	10/11/1994	

	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 '	88 ° 24 '	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:	SWIMS
38 .51	34 .02		Township:	TerraServer
(033.510697)	(088.409450)		Range:	Map It

10/13/2006 10:29:50 AM

Kerr McGee Chemical Corporation, Columbus

General Information

ID	Branch	SIC	County	Basin	Start	End
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Columbus, MS 39701	Oklahoma City, OK 731268859

Telecommunications

Туре	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	

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38 .51	34 .2		Township:	TerraServer
(033.510697)	(088.409450)		Range:	Map It

Report Date: 12/15/2005 9:06:32 AM

COMPLIANCE EVALUATION INSPECTIONS
KERR-MCGEE CHEMICAL CORP.
COCUMBUS, MISSISSIPPI
LUNE 30, 1997