

Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT

EPA ID# _____
 DATE _____

Name of Facility _____ **Owner/Operator** _____ **Phone** _____

Facility Mailing Address _____ **City** _____ **Zip Code** _____ **County** _____

Oklahoma Administrative Code (OAC) 252:205-3-2 adopts by reference certain federal regulations found in Title 40 of the Code of Federal Regulations (40 CFR). This document does not include all state and federal regulations that may be applicable. *Supplemental checklists (e.g. tank storage, landfills, containment buildings, drip pads, groundwater monitoring, Subparts AA/BB/CC, etc.) may be required, depending on permitted hazardous waste treatment, storage, or disposal activities.*

Regulatory Requirements	Area of Non-compliance	Remarks
A. General Requirements		
A.1. Has the o/o obtained an EPA ID number? [40 CFR 264/265.11]		
A.2. Does the o/o notify the DEQ at least four weeks in advance of receipt of hazardous waste from a foreign source? [40 CFR 264/265.12(a)(1)] (<i>Note: If applicable, include copies of manifests or other records that identify generator, country of origin, and type of waste received</i>)		
A.3. Does the o/o notify each off-site facility from which hazardous waste is received that he has the appropriate permits for, and will accept, the waste being shipped to the TSD? [40 CFR 264.12(b)] (<i>Note: Not required if TSD is interim status</i>)		
B. Waste Analysis		
B.1. Does the o/o obtain a detailed chemical and physical analysis of a representative sample of all wastes received? [40 CFR 264/265.13(a)(1)] (<i>e.g. laboratory analysis, data developed under Part 261, published data, data from wastes from similar processes, etc.</i>)		
B.2. Does the o/o ensure analyses are repeated as necessary to ensure they are accurate and up to date? [40 CFR 264.13(a)(3)] (<i>e.g. when process generating waste has changed or when waste received does not match waste on the manifest/shipping paper</i>)		
B.3. Does the o/o inspect and, if necessary, analyze each hazardous waste received at the facility to determine whether it matches the waste on the manifest? [40 CFR 264/265.13(a)(4)]		
B.4. Has the o/o developed a written waste analysis plan (WAP)? [40 CFR 264/265.13(b)] If no, skip to Section C.		
B.4.1. Is the WAP maintained at the facility? [40 CFR 264/265.13(b)]		
B.4.2. Does the WAP include EACH of the following, as applicable: (1) parameters for which each waste will be analyzed; (2) test methods; (3) sampling methods; (4) frequency of analysis; (5) waste analyses to be provided by off-site generators; (6) additional analyses required for ignitable/reactive wastes, bulk or containerized liquids, incineration, compliance with Subparts AA, BB, & CC, and for meeting LDR standards; (7) procedures and schedules for surface impoundments exempted from LDR standards; and (8) procedures and schedules necessary for seeking exemptions from Subpart CC? [40 CFR 264/265.13(b)(1) – (b)(8)]		
B.4.3. Does the WAP specify the procedures to be used to inspect and analyze each movement of hazardous waste received at the facility? [40 CFR 264/265.13(c)]		
B.5. Does the o/o appear to comply with all provisions of the WAP? [Permit] If no, identify deficiencies.		
C. Site Security		
C.1. Does the o/o maintain EACH of the following: (<i>Identify which standards are met</i>) If BOTH standards are met, skip to Section D. _____ (1) a 24-hour surveillance system that continuously monitors and controls entry onto the active portion of the facility; OR (2) an artificial or natural barrier that completely surrounds the active portion of the facility and a means to control entry at all times through the gates or other entry points to the active portion? [40 CFR 264/265.14(b)(1) and (b)(2)] AND _____ signs with the legend “Danger – Unauthorized Personnel Keep Out” posted at each entrance to the active portion and at other locations in sufficient numbers to be seen from any approach? [40 CFR 264/265.14(c)]		

Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT

EPA ID# _____
 DATE _____

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C.1.1. Has the o/o demonstrated to the DEQ that: (1) physical contact with waste, structures, or equipment will not injure the unauthorized persons or livestock; AND (2) disturbance of the waste or equipment caused by such incursions will not cause a violation of this requirement? [40 CFR 264/265.14(a)(1) and (a)(2)]		
D. General Inspection Requirements		
D.1. Does the o/o inspect the facility for malfunctions, deterioration, operator error, and discharges which may result in a release to the environment or harm to human health? [40 CFR 264/265.15(a)]		
D.2. Is the frequency of the inspections adequate to identify problems in time to correct them before they harm human health or the environment? [40 CFR 264/265.15(a)]		
D.3. Has the o/o developed a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment? [40 CFR 264/265.15(b)(1)] If no, skip to D.4.		
D.3.1. Does the o/o maintain the schedule at the facility? [40 CFR 264/265.15(b)(2)]		
D.3.2. Does the schedule identify the types of problems which are to be looked for during the inspections? [40 CFR 264/265.15(b)(3)]		
D.3.3. Does the schedule require daily inspections of areas subject to spills, such as loading and unloading areas? [40 CFR 264/265.15(b)(4)]		
D.4. Has the o/o remedied any problems found during the inspections? [40 CFR 264/265.15(c)]		
D.5. Does the o/o maintain an inspection log that contains EACH of the following: (1) date/time of the inspection; (2) name of inspector; (3) notation of observations made; and (4) date and nature of any repairs or other remedial action? [40 CFR 264/265.15(d)]		
D.6. Does the o/o maintain inspection records for at least three years from the date of the inspection? [40 CFR 264/265.15(d)] <i>(Include copies of inspection records)</i>		
E. Personnel Training		
E.1. Has the o/o developed and implemented a training program for those employees who manage HW? [40 CFR 264/265.16(a)] If no, skip to E.2.		
E.1.1. Does the o/o ensure the training is directed by a person trained in HW management procedures? [40 CFR 264/265.16(a)(2)]		
E.1.2. Does the o/o ensure the training includes EACH of the following: (1) procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (2) key parameters for automatic waste feed cut-off systems; (3) use of communications or alarm systems; (4) responses to fires or explosions; (5) responses to groundwater contamination incidents; AND (6) procedures for shutdown of operations? [40 CFR 264/265.16(a)(3)] <i>(Note: OSHA emergency response training that includes these items is satisfactory for meeting this requirement)</i>		
E.2. Does the o/o ensure each new or reassigned employee receives training within 6 months of employment or reassignment? [40 CFR 264/265.16(b)]		
E.3. Does the o/o ensure each employee receives an annual review of training? [40 CFR 264/265.16(c)] <i>(Include copies of sign-in sheets or other documentation of training)</i>		
E.4. Does the o/o maintain EACH of the following records at the facility: (1) the job title & name of each employee for all positions related to HW management; (2) a written job description for each position related to HW management, to include requisite skill, education, or other qualifications; (3) a written description of the type and amount of introductory and continuing education to be provided to the employee in each position; AND (4) records to document employee training? [40 CFR 264/265.16(d)]		
E.5. Does the o/o maintain training records of former employees for at least 3 years after employment ended? [40 CFR 264/265.16(e)]		
F. Ignitable, Reactive, or Incompatible Wastes		
F.1. Does the o/o ensure ignitable, reactive, and incompatible wastes are separated and protected from sources of ignition or reaction? [40 CFR 264/265.17(a)]		
F.2. Does the o/o ensure smoking and open flames are confined to specially designated areas? [40 CFR 264/265.17(a)]		
F.3. Does the o/o ensure "No Smoking" signs are conspicuously placed in areas where ignitable or reactive wastes are handled? [40 CFR 264/265.17(a)]		

Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT

EPA ID# _____
 DATE _____

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G. Preparedness & Prevention		
G.1. Does the o/o ensure the facility is maintained and operated to minimize releases of HW or constituents to air, soil or surface water? [40 CFR 264/265.31]		
G.2. Does the o/o provide internal communications or an alarm system capable of providing immediate emergency instruction to personnel? [40 CFR 264/265.32(a)]		
G.3. Does the o/o provide a telephone or radio that is immediately available to call emergency personnel? [40 CFR 264/265.32(b)]		
G.4. Does the o/o provide fire extinguishers, spill control equipment, decontamination equipment, and water at adequate volume and pressure? [40 CFR 264/265.32(c) and (d)]		
G.5. Does the o/o ensure all facility communications, alarms, fire protection equipment, and spill control equipment is tested and maintained as necessary to assure proper operation? [40 CFR 264/265.33]		
G.6. Does the o/o ensure all personnel managing hazardous waste have immediate access to an internal alarm or emergency communication device? [40 CFR 264/265.34(a)]		
G.7. When only one employee is on the premises, does the o/o ensure that employee has immediate access to a device capable of summoning external emergency assistance? [40 CFR 264/265.34(b)]		
G.8. Does the o/o ensure there is sufficient aisle space to allow unobstructed movement of personnel and equipment in storage areas? [40 CFR 264/265.35]		
G.9. Has the o/o provided local authorities with facility layout, properties of HW, locations of work areas, road entrances and evacuation routes? [40 CFR 264/265.37(a)(1)]		
G.10. Has the o/o made agreements with emergency response contractors and equipment suppliers? [40 CFR 264/265.37(a)(3)]		
G.11. Has the o/o provided local hospitals with properties of HW handled and types of injuries possible? [40 CFR 264/265.37(a)(4)]		
H. Contingency Plan and Emergency Procedures		
H.1. Does the o/o have a contingency plan at the facility? [40 CFR 264/265.51(a) & 53(a)]		
H.2. Has the o/o provided a copy of the contingency plan to all applicable local police and fire departments, hospitals, and emergency response teams? [40 CFR 264/265.53(b)]		
H.3. Does the contingency plan describe actions to be taken by facility personnel in response to fires, explosions, or releases of HW or HW constituents? [40 CFR 264/265.52(a)]		
H.4. Does the contingency plan include a description of arrangements with local authorities? [40 CFR 264/265.52(c)]		
H.5. Does the contingency plan include an up-to-date list of persons qualified to act as emergency coordinator? [40 CFR 264/265.52(d)]		
H.6. Does the o/o ensure one person is listed as the primary emergency coordinator, with other persons listed in the order in which they will assume emergency coordinator responsibilities? [40 CFR 264/265.52(d)]		
H.7. Does the contingency plan include an up-to-date list of all emergency and decontamination equipment, its location, a brief description of the equipment, and a brief outline of its capabilities? [40 CFR 264/265.52(e)]		
H.8. Does the contingency plan include an employee evacuation plan (to include evacuation signals, primary routes, and alternate routes)? [40 CFR 264/265.52(f)]		
H.9. Did the o/o amend the contingency plan in the event of a regulatory change, plan failure during an emergency, the facility changes, the emergency coordinators change, or emergency equipment changes? [40 CFR 264/265.54] <i>(Note: Identify date and nature of any event which required an amendment, whether the amendment occurred or not)</i>		
H.10. Does the o/o ensure the emergency coordinator is on-site or on-call at all times? [40 CFR 264/265.55]		
H.11. Does the o/o ensure the emergency coordinator is thoroughly familiar with all aspects of the contingency plan, facility operations, wastes managed, location of records, and has the authority to commit the resources to carry out the contingency plan? [40 CFR 264/265.55]		
H.12. If there have been no incidents requiring implementation of the contingency plan, skip to Section I. <i>(Note: Identify date(s), nature, and quantities of releases)</i>		
H.12.1. Did the o/o carry out the provisions of the contingency plan during a fire, explosion, or release of HW or HW constituents? [40 CFR 264/265.51(b)]		
H.12.2. Did the o/o immediately notify the DEQ? [OAC 252:205-13-1(a)]		

Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT

EPA ID# _____
 DATE _____

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H.12.3. Did the o/o submit a written report regarding the incident to the DEQ that included all of the following: (1) name, address, and phone number of the o/o; (2) name, address, and phone number of the facility; (3) date, time, and type of incident; (4) name and quantity of materials involved; (5) extent of any injuries; (6) assessment of actual or potential hazards to health or the environment; and (7) estimated quantity and disposition of material resulting from the incident? [40 CFR 264/265.56(i)]		
H.12.4. Did the o/o ensure proper disposal of wastes generated as a result of the incident? [OAC 252:205-13-1(e)]		
I. Manifest Requirements (Identify number of manifests reviewed: _____)		
I.1. Does the o/o ensure each manifest is signed and dated when hazardous waste is received? [40 CFR 264/265.71(a)(1)]		
I.2. Does the o/o ensure that discrepancies are noted on each copy of the manifest? [40 CFR 264/265.71(a)(2)]		
I.3. Does the o/o ensure a copy of the manifest is returned to the generator within 30 days of receipt of the waste? [40 CFR 264/265.71(a)(4)]		
I.4. Does the o/o maintain copies of manifests for at least three years from the date of receipt? [40 CFR 264/265.71(a)(5)]		
I.5. Upon discovery of a significant discrepancy, does the o/o attempt to reconcile the discrepancy with the generator or transporter? [40 CFR 264/265.72(b)]		
I.6. If a significant discrepancy was not resolved within 15 days after receipt of the waste, did the o/o submit a letter to the DEQ describing the discrepancy and attempts to reconcile it, along with a copy of the manifest in question? [40 CFR 264/265.72(b)]		
I.7. If the o/o accepted hazardous waste that was not accompanied by a manifest, was an unmanifested waste report submitted to the DEQ? [40 CFR 264/265.76]		
I.8. Was the unmanifested waste report submitted within 15 days of receipt of the waste? [40 CFR 264/265.76(a)]		
I.9. Did the unmanifested waste report include EACH of the following: (1) EPA ID number, name, and address of the facility; (2) date the waste was received; (3) EPA ID number, name, and address of the generator and transporter; (4) description and quantity of unmanifested waste received; (5) method of treatment, storage, or disposal of the waste; (6) certification signed by the o/o or authorized representative, AND (7) brief explanation of why the waste was unmanifested. [40 CFR 264/265.76(a) – (g)]		
J. Recordkeeping and Reporting		
J.1. Does the o/o maintain the following in the operating record for the time specified: [40 CFR 264/265.73] (Identify which standards are met, or N/A) ___ a description and the quantity of each hazardous waste received and the methods and dates of its treatment, storage, or disposal? (until closure) ___ the location of each hazardous waste within the facility and the quantity at each location, to include, if applicable, a map or diagram of each disposal cell? (until closure) ___ records and results of waste analyses and waste determinations? (3 years) ___ reports of all incidents requiring implementation of the contingency plan? (3 years) ___ records and results of site inspections? (3 years) ___ monitoring, testing, or analytical data and corrective action (if required)? (3 years, except until closure for groundwater monitoring data) ___ notices to generators for waste received from off-site? (3 years) ___ all closure and post-closure cost estimates? (until closure) ___ annual certification that there is a waste reduction program in place? (3 years) ___ records of the quantities of hazardous waste placed into land disposal units under an extension to the effective date of any land disposal restriction? (until closure) ___ copies of LDR notifications from generators? (3 years) ___ monitoring data required by 40 CFR 264.345 for HW incinerators? (5 years) ___ certification of major repairs on tanks required by 40 CFR 264/265.196(f)? (until closure)		

Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT

EPA ID# _____
 DATE _____

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J.2. Does the o/o prepare and submit a Biennial Report to the DEQ by March 1 st of each even numbered year, or April 1 st if approved by DEQ? [40 CFR 264/265.75]		
J.3. Does the o/o submit monthly reports to the DEQ? [OAC 252:205-9-2]		
J.4. Does the o/o remit required fees to the DEQ? [OAC 252:205-21-4(c)]		
K. Container Management		
K.1. Does the o/o ensure each container of HW is in good condition? [40 CFR 264/265.171] If yes, skip to K.2.		
K.1.1. Has the o/o transferred the waste into a container that is in good condition, or managed the waste in another way to prevent leaks? [40 CFR 264/265.171]		
K.2. Does the o/o ensure each container of HW is made of or lined with materials that are compatible with the waste being stored? [40 CFR 264/265.172]		
K.3. Does the o/o ensure each container of HW is closed, except when adding or removing waste? [40 CFR 264/265.173(a)]		
K.4. Does the o/o ensure each container of HW is opened, handled, or stored in a manner to prevent ruptures or leaks? [40 CFR 264/265.173(b)]		
K.5. Does the o/o ensure each HW container storage area is inspected at least weekly for leaks or deterioration of containers and the containment system? [40 CFR 264/265.174]		
K.6. Does the o/o ensure each container holding ignitable or reactive waste is stored at least 50 feet from the facility property line? [40 CFR 264/265.176]		
K.7. Does the o/o prevent incompatible wastes and/or materials from being placed into the same container? [40 CFR 264/265.177(a)] If yes, skip to K.8.		
K.7.1. Does the o/o ensure mixing of incompatible wastes and or materials is performed in a manner to prevent the generation of extreme heat, pressure, fire/explosion, violent reaction, uncontrolled toxic vapors or dust, uncontrolled flammable fumes, damage to structural integrity, or other problems that threaten human health or the environment? [40 CFR 264/265.177(a) → 264/265.17(b)]		
K.8. Does the o/o ensure HW is not placed in an unwashed container that previously held an incompatible waste or material? [40 CFR 264/265.177(b)] If yes, skip to K.9.		
K.8.1. (<i>Note: only applicable to interim status facilities</i>) Does the o/o ensure mixing of incompatible wastes and or materials is performed in a manner to prevent the generation of extreme heat, pressure, fire/explosion, violent reaction, uncontrolled toxic vapors or dust, uncontrolled flammable fumes, damage to structural integrity, or other problems that threaten human health or the environment? [40 CFR 265.177(b) → 265.17(b)]		
K.9. Does the o/o ensure incompatible wastes and/or materials are physically separated by a dike, berm, wall, or other device? [40 CFR 264/265.177(c)]		
K.10. Does the o/o ensure the number of containers or quantity of waste in the container storage area does not exceed that allowed by the permit? [Permit] (<i>If no, identify the container storage area, the amount authorized by the permit and the amount being stored</i>)		
<i>(Note: Items K.11. through K.16. do not apply to interim status facilities)</i>		
K.11. Does the o/o ensure each container storage area has a containment system? [40 CFR 264.175(a)]		
K.12. Does the containment system include a base that is free of cracks or gaps and sufficiently impervious to contain leaks or spills? [40 CFR 264.175(b)(1)]		
K.13. Does the containment system meet ONE of the following: (<i>Identify which standard is met</i>) <input type="checkbox"/> the base of the containment system is sloped or otherwise designed to drain liquids; OR <input type="checkbox"/> containers are elevated or otherwise protected from contact with accumulated liquids? [40 CFR 264.175(b)(2)]		
K.14. Is the containment system designed with sufficient capacity to contain 10% of the volume of the containers, or the volume of the largest container, whichever is greater? [40 CFR 264.175(b)(3)]		
K.15. Is the containment system designed to prevent run-on OR is it designed with sufficient excess capacity to contain run-on? [40 CFR 264.175(b)(4)]		
K.16. Does the o/o ensure liquids are removed from the containment system in as timely a manner as necessary to prevent overflow? [40 CFR 264.175(b)(5)]		

Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT

EPA ID# _____
 DATE _____

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L. Closure Requirements		
L.1. Does the o/o have an approved closure plan that includes EACH of the following: <i>(Identify which standards are met)</i> _____ a description of how each hazardous waste management unit at the facility will be closed? [40 CFR 264/265.112(b)(1)] _____ a description of how final closure of the facility will be conducted? [40 CFR 264/265.112(b)(2)] _____ identification of the maximum extent of operations which will be unclosed during the active life of the facility? [40 CFR 264/265.112(b)(2)] _____ an estimate of the maximum inventory of hazardous waste ever on-site over the active life of the facility? [40 CFR 264/265.112(b)(3)] _____ a description of methods to be used during partial closures and final closure? [40 CFR 264/265.112(b)(3)] _____ a description of steps needed to remove or decontaminate all hazardous waste residues and contaminated structures and equipment? [40 CFR 264/265.112(b)(4)] _____ a description of groundwater monitoring procedures, leachate management, run-on/run-off controls, and other activities necessary to achieve final closure? [40 CFR 264/265.112(b)(5)] _____ a schedule for closure of each hazardous waste management unit and final closure of the facility? [40 CFR 264/265.112(b)(6)] _____ an estimate of the expected year of final closure (if using a trust fund as the financial assurance mechanism)? [40 CFR 264/265.112(b)(7)] _____ any alternative closure requirements required by the DEQ? [40 CFR 264/265.112(b)(8)]		
L.2. Did the o/o submit a revised closure plan whenever: (1) changes in operating plans or facility design affected the closure plan; (2) there was a change in the expected year of closure; or (3) unexpected events require a modification to the approved closure plan? [40 CFR 264.112(c)(2)/265.112(c)(1)]		
L.3. Did the o/o submit a revised closure plan within 60 days of an event requiring a modification to the plan? [40 CFR 264/265.112(c)(3)]		
L.4. If no hazardous waste management units have begun or are undergoing closure activities, skip to L.5		
L.4.1. Did the o/o notify the DEQ in writing at least 60 days prior to the date he expected to begin closure of a surface impoundment, waste pile, land treatment unit, or landfill unit, or final closure of a facility with such a unit? [40 CFR 264/265.112(d)(1)]		
L.4.2. Did the o/o notify the DEQ in writing at least 45 days prior to the date he expected to begin final closure of a facility with only treatment or storage tanks, container storage, or incinerator units? [40 CFR 264/265.112(d)(1)]		
L.4.3. Did the o/o notify the DEQ in writing at least 45 days prior to the date he expected to begin partial or final closure of a BIF? [40 CFR 264/265.112(d)(1)]		
L.4.4. Did the o/o treat, remove from the unit or facility, or dispose on-site, all hazardous waste within 90 days of the final receipt of waste into the unit or facility (or an alternative length of time as approved by the DEQ)? [40 CFR 264/265.113(a)]		
L.4.5. Did the o/o complete partial or final closure activities within 180 days of the date waste was finally received into the unit or facility (or an alternative length of time as approved by the DEQ)? [40 CFR 264/265.113(b)]		
L.5. If no hazardous waste management units have completed closure activities, skip to Section M.		
L.5.1. Did the o/o submit a certification of closure within 60 days of completion of closure of each hazardous waste surface impoundment, waste pile, land treatment unit, or landfill? [40 CFR 264/265.115]		
L.5.2. Did the o/o submit a certification of final closure within 60 days of final closure of the facility? [40 CFR 264/265.115]		
L.5.3. Did the certification demonstrate the unit or facility was closed in accordance with the closure plan? [40 CFR 264/265.115]		
L.5.4. Was the certification signed by the o/o and a qualified professional engineer? [40 CFR 264/265.115]		
L.5.5. With the closure certification, did the o/o include a survey plat indicating the location and dimension of landfill cells or other hazardous waste disposal units? [40 CFR 264/265.116]		
L.5.6. Did the o/o ensure the location and dimensions were surveyed with respect to permanently surveyed benchmarks? [40 CFR 264/265.116]		

Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT

EPA ID# _____
 DATE _____

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L.5.7. Did the o/o ensure the survey plat was prepared and certified by a professional land surveyor? [40 CFR 264/265.116]		
L.5.8. Did the o/o ensure the survey plat was also submitted to the local zoning authority or the authority with jurisdiction over local land use? [40 CFR 264/265.116]		
L.5.9. Did the o/o ensure the survey plat included a notice stating the o/o's obligation to restrict disturbance of the hazardous waste disposal units? [40 CFR 264/265.116]		
M. Post-closure Requirements (<i>Note: Complete this Section only if regulated units include surface impoundments, land treatment units, landfills, or waste piles</i>)		
M.1. Has the o/o begun post-closure care for each hazardous waste management unit after completion of closure activities for the unit? [40 CFR 264/265.117(a)]		
M.2. Does the o/o ensure that post-closure use of areas in which hazardous waste remains after closure does not disturb the integrity of final cover, liners, monitoring systems, or any other components of the containment system? [40 CFR 264/265.117(c)] If yes, skip to M.3.		
M.2.1. Has the DEQ approved of the disturbance? [40 CFR 264/265.117(c)]		
M.3. Does the o/o have an approved post-closure plan that includes EACH of the following: (<i>Identify which standards are met</i>) ___ a description of the planned monitoring activities and frequencies at which they will be performed? [40 CFR 264.118(b)(1)/265.118(c)(1)] ___ a description of the planned maintenance activities and frequencies they will be performed? [40 CFR 264.118(b)(2)/265.118(c)(2)] ___ the name, address, and phone number for a facility contact during the post-closure period? [40 CFR 264.118(b)(3)/265.118(c)(3)] ___ a description of any alternative requirements that have been approved by the DEQ? [40 CFR 264.118(b)(4)/265.118(c)(5)]		
M.4. Did the o/o submit a revised post-closure plan whenever: (1) changes in operating plans or facility design affected the post-closure plan; (2) there was a change in the expected year of final closure; or (3) unexpected events require a modification to the approved post-closure plan? [40 CFR 264.118(d)(2)/265.118(d)(1)]		
M.5. Did the o/o submit a revised post-closure plan within 60 days of an event requiring a modification to the plan? [40 CFR 264/265.118(d)(3)]		
N. Financial Assurance (<i>Note: Not required for Federal Facility TSDs</i>)		
Closure		
N.1. Does the o/o have a detailed written estimate of closure costs? [40 CFR 264/265.142(a)]		
<i>(Identify current closure cost estimate and date approved)</i>		
\$		
N.1.1. Do the closure cost estimates equal the cost of final closure at the point when closure would be most expensive? [40 CFR 264/265.142(a)(1)]		
N.1.2. Do the closure cost estimates detail the cost of hiring a third party to perform closure? [40 CFR 264/265.142(a)(2)]		
N.1.3. Has the o/o adjusted closure costs for inflation within 60 days prior to the anniversary date of the establishment of the financial assurance mechanism? [40 CFR 264/265.142(b)]		
N.1.4. Has the o/o revised closure cost estimates within 30 days of approval of a closure plan modification? [40 CFR 264/265.142(c)]		
N.2. Has the o/o established financial assurance for closure through at least one of the following financial assurance mechanisms? [40 CFR 264/265.143] (<i>Identify which closure financial assurance mechanism(s) is(are) used</i>) ___ Trust fund ___ Surety bond ___ Financial test/guarantee ___ Insurance ___ Letter of credit		
N.2.1. Is the wording of the financial assurance mechanism as specified in 40 CFR 264.151? [40 CFR 264/265.143]		
N.2.2. If a trust fund is used as a financial assurance mechanism, has the o/o made proper annual payments into the trust? [40 CFR 264/265.143(a)(3)] <i>(Identify closure trust fund balance and date)</i> \$		

Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT

EPA ID# _____
 DATE _____

Regulatory Requirements	Area of Non-compliance	Remarks
<i>Post-Closure (Note: Complete this portion only if regulated units include surface impoundments, land treatment units, landfills, or waste piles, or if the facility is otherwise required to have post-closure financial assurance)</i>		
N.3. Does the o/o have a detailed written estimate of post-closure costs? [40 CFR 264/265.144(a)] <i>(Identify current post-closure cost estimate and date approved)</i> \$		
N.3.1. Do the post-closure cost estimates detail the cost of hiring a third party to perform post-closure activities? [40 CFR 264/265.144(a)(1)]		
N.3.2. Has the o/o adjusted post-closure costs for inflation within 60 days prior to the anniversary date of the establishment of the financial assurance mechanism? [40 CFR 264/265.144(b)]		
N.3.3. Has the o/o revised post-closure cost estimates within 30 days of approval of a post-closure plan modification? [40 CFR 264/265.144(c)]		
N.4. Has the o/o established financial assurance for post-closure through at least one of the following financial assurance mechanisms? [40 CFR 264/265.145] <i>(Identify which post-closure financial assurance mechanism(s) is(are) used)</i> <input type="checkbox"/> Trust fund <input type="checkbox"/> Surety bond <input type="checkbox"/> Financial test/guarantee <input type="checkbox"/> Insurance <input type="checkbox"/> Letter of credit		
N.4.1. Is the wording of the financial assurance mechanism as specified in 40 CFR 264.151? [40 CFR 264/265.145]		
N.4.2. If a trust fund is used as a financial assurance mechanism, has the o/o made proper annual payments into the trust? [40 CFR 264/265.145(a)(3)] <i>(Identify post-closure trust fund balance and date)</i> \$		
Liability Requirements		
N.5. Does the o/o maintain liability coverage for bodily injury and property damage to third parties caused by sudden accidental occurrences from facility operations? [40 CFR 264/265.147(a)] <i>(Note: Required for all TSD facilities)</i> If no, skip to N.6.		
N.5.1. Is the liability coverage at least \$1 million per occurrence, with an annual aggregate of at least \$2 million, exclusive of legal defense costs? [40 CFR 264/265.147(a)] <i>(Identify amount of coverage)</i> \$ /\$		
N.5.2. Has the o/o demonstrated sudden liability coverage through at least one of the following mechanisms? [40 CFR 264/265.147(a)] <i>(Identify which sudden liability mechanism(s) is(are) used)</i> <input type="checkbox"/> Trust fund <input type="checkbox"/> Surety bond <input type="checkbox"/> Financial test/guarantee <input type="checkbox"/> Liability Insurance <input type="checkbox"/> Letter of credit		
N.5.3. Is the wording of the liability coverage mechanism for sudden occurrences as specified in 40 CFR 264.151? [40 CFR 264/265.147]		
N.5.4. Did the o/o notify the DEQ within 30 days of any claim filed for bodily injury or property damage? [40 CFR 264/265.147(a)(7)]		
N.6. Does the o/o maintain liability coverage for bodily injury and property damage to third parties caused by non-sudden accidental occurrences from facility operations? [40 CFR 264/265.147(b)] <i>(Note: Required only for surface impoundments, landfills, land treatment facilities, or disposal miscellaneous units)</i> If no, skip to Section O.		
N.6.1. Is the liability coverage at least \$3 million per occurrence, with an annual aggregate of at least \$6 million? [40 CFR 264/265.147(b)] <i>(Identify amount of coverage)</i> \$ /\$		
N.6.2. Has the o/o demonstrated non-sudden liability coverage through at least one of the following mechanisms? [40 CFR 264/265.147(b)] <i>(Identify which non-sudden liability mechanism(s) is(are) used)</i> <input type="checkbox"/> Trust fund <input type="checkbox"/> Surety bond <input type="checkbox"/> Financial test/guarantee <input type="checkbox"/> Liability Insurance <input type="checkbox"/> Letter of credit		
N.6.3. Is the wording of the liability coverage mechanism for non-sudden occurrences as specified in 40 CFR 264.151? [40 CFR 264/265.147]		
N.6.4. Did the o/o notify the DEQ within 30 days of any claim filed for bodily injury or property damage? [40 CFR 264/265.147(b)(7)]		

Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT

EPA ID# _____
 DATE _____

Regulatory Requirements	Area of Non-compliance	Remarks
O. Land Disposal Restrictions		
<i>Dilution Prohibition</i>		
O.1. Does the o/o ensure dilution: _____ is not substituted for adequate treatment to achieve treatment standards? [40 CFR 268.3(a)] OR _____ occurs only in a system subject to NPDES or pretreatment requirements (where the treatment standard is concentration-based or DEACT, or the waste is D003 reactive cyanide wastewater or nonwastewater) [40 CFR 268.3(b)] (<i>Note: If technology-based treatment standard is not DEACT, dilution in such a system is impermissible</i>)		
Testing, Tracking, & Recordkeeping		
<i>Treatment Facilities</i>		
O.2. Does the o/o ensure testing of wastes is performed in accordance with the approved waste analysis plan? [40 CFR 268.7(b)]		
O.3. Does the o/o ensure a notice containing EACH of the following is included with the initial shipment of waste to the disposal facility: (1) waste codes and manifest number of the first shipment; (2) notice that the waste is subject to LDR; (3) identification of constituents of concern for F001-F005 and F039; (4) underlying hazardous constituents; (5) applicable wastewater and non-wastewater category and subdivision; (6) waste analysis data if available; AND (7) identification of constituents subject to treatment (for contaminated soils only)? [40 CFR 268.7(b)(3)]		
O.4. Does the o/o ensure a new notice is sent whenever the waste or receiving facility is changed? [40 CFR 268.7(b)(3)(i)]		
O.5. Does the o/o maintain a copy of the notice in the operating record? [40 CFR 268.7(b)(3)]		
O.6. Does the o/o ensure the certification in 40 CFR 268.7(b)(4) is submitted to the disposal facility with the initial shipment of waste? [40 CFR 268.7(b)(4)]		
O.7. Does the o/o ensure a new certification is sent whenever the waste or receiving facility is changed? [40 CFR 268.7(b)(4)(i)]		
O.8. Does the o/o maintain a copy of the certification in the operating record? [40 CFR 268.7(b)(4)(i)]		
<i>Disposal Facilities</i>		
O.9. Does the o/o maintain copies of the notices and certifications identified in O.3. – O.8. in the operating record? [40 CFR 268.7(c)(1)]		
O.10. Does the o/o ensure testing of wastes is performed in accordance with the approved waste analysis plan? [40 CFR 268.7(c)(2)]		
Compliance with Treatment Standards		
O.11. Does the o/o ensure hazardous waste is not land disposed unless the waste meets the specified concentration-based or technology-based treatment standard? [40 CFR 268.40(a)/268.42(a)] (<i>If no, identify the wastes that were disposed, associated waste code(s), and include documentation to show waste did not meet treatment standard</i>)		
O.12. If wastes with different treatment standards are combined for the purpose of treatment, does the o/o ensure the treatment residue meets the lowest treatment standard prior to land disposal? [40 CFR 268.40(c)]		
O.13. For characteristic wastes with a treatment standard, does the o/o ensure all underlying hazardous constituents meet the Universal Treatment Standards of 40 CFR 268.48 prior to land disposal? [40 CFR 268.40(e)] (<i>Note: Not applicable to characteristic wastes managed in a CWA-regulated wastewater treatment system or Class I non-hazardous injection well</i>)		

Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT

EPA ID# _____
 DATE _____

Regulatory Requirements	Area of Non-compliance	Remarks
Alternative Standards for Lab Packs		
<p>O.14. If lab packs are disposed without meeting treatment standards, does the o/o ensure EACH of the following conditions are met? (<i>Identify which standards are met</i>)</p> <p>_____ Do the lab packs comply with applicable provisions of 40 CFR 264.316/265.316? [40 CFR 268.43(c)(1)]</p> <p>_____ Do the lab packs not include D009, F019, K003 – K006, K062, K071, K100, K106, P010 – P012, P076, P078, U134, U151? [49 CFR 268.43(c)(2)]</p> <p>_____ Are the lab packs incinerated in accordance with 40 CFR Part 264/265, Subpart O? [40 CFR 268.43(c)(3)]</p> <p>_____ Are incinerator residues containing D004 – D008, D010, or D011 treated to meet treatment standards before disposal? [40 CFR 268.43(c)(4)]</p>		
Treatment Standards for Hazardous Debris		
O.15. Does the o/o ensure ignitable, corrosive, or reactive hazardous debris is treated using one of the methods in Table 1 of 40 CFR 268.45 prior to land disposal? [40 CFR 268.45(a)(2)]		
O.16. For mixtures of debris types, does the o/o ensure each debris type is treated using the applicable treatment technology in Table 1 of 40 CFR 268.45 prior to land disposal? [40 CFR 268.45(a)(3)]		
O.17. For mixtures of contaminant types, does the o/o ensure each contaminant is treated using the applicable treatment technology in Table 1 of 40 CFR 268.45 prior to land disposal? [40 CFR 268.45(a)(4)]		
O.18. Does the o/o ensure immobilization is the last treatment technology used prior to land disposal, if that technology is used in a treatment train? [40 CFR 268.45(a)(3) or (a)(4)]		
O.19. Does the o/o ensure hazardous debris that is also a waste PCB under 40 CFR Part 761 is treated in accordance with 40 CFR 268.45 or 40 CFR Part 761 prior to land disposal, whichever is more restrictive? [40 CFR 268.45(a)(5)]		
O.20. Does the o/o ensure hazardous debris that also exhibits a toxicity characteristic is treated for the characteristic prior to land disposal? [40 CFR 268.45(b)(1)]		
O.21. Does the o/o ensure hazardous debris contaminated with a listed waste is treated for the listed waste prior to land disposal? [40 CFR 268.45(b)(2)]		
O.22. Does the o/o ensure cyanide-reactive hazardous debris is treated for cyanide prior to land disposal? [40 CFR 268.45(b)(3)]		
Standards for Hazardous Debris Treatment Residue		
O.23. Does the o/o ensure residue from the treatment of hazardous debris is separated from the treated debris? [40 CFR 268.45(d)(i)]		
O.24. Does the o/o ensure residue from the treatment of hazardous debris meets the treatment standard of 40 CFR 268.40 prior to land disposal? [40 CFR 268.45(d)(ii)]		
O.25. Does the o/o ensure residue from deactivation of ignitable, corrosive, or reactive (other than cyanide reactive) characteristic debris is deactivated prior to land disposal? [40 CFR 268.45(d)(2)] (<i>Note: Not applicable if the residue exhibits a toxicity characteristic, is contaminated with a listed waste, or is from treatment of cyanide-reactive debris</i>)		
O.26. Does the o/o ensure residue from the treatment of cyanide-reactive hazardous debris meets the treatment standards for D003 in 40 CFR 268.40 prior to land disposal? [40 CFR 268.45(d)(3)]		
O.27. Does the o/o ensure ignitable nonwastewater residue with $\geq 10\%$ TOC meets the treatment standard for D001 ignitable liquids in 40 CFR 268.40 prior to land disposal? [40 CFR 268.45(d)(4)]		
O.28. Does the o/o ensure layers of debris removed by spalling meet the treatment standards of Table 1 in 40 CFR 268.45 prior to land disposal? [40 CFR 268.45(d)(5)]		
Prohibitions on Storage of Restricted Wastes		
O.29. Does the o/o ensure each container storing HW is clearly marked to identify its contents and the date each period of accumulation began? [40 CFR 268.50(a)(2)(i)]		

**Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT**

EPA ID# _____
DATE _____

Regulatory Requirements	Area of Non-compliance	Remarks
<p>O.30. Does the o/o ensure each tank storing HW meets ONE of the following: <i>(Identify which standard is met)</i> _____ is clearly marked with: (1) a description of its contents; (2) the quantity of each HW received; and (3) the date each period of accumulation began;</p> <p>OR</p> <p>_____ such information for each tank is maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]</p>		
<p>O.31. Does the o/o ensure HW is stored for one year or less? [40 CFR 268.50(b)] <i>(Note: If no, provide a complete description, to include waste name, location, date storage began, and reason for length of storage)</i></p>		
<p>O.31.1. If HW is stored more than one year, has the o/o demonstrated such storage is solely to accumulate sufficient quantities to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]</p>		
<p>P. Site Specific Permit Conditions</p>		
<p>P.1. Is the o/o meeting all conditions of the facility permit that are not otherwise addressed in this checklist? {Permit} <i>(Note: If no, a complete description of the permit condition and violation noted must be included)</i></p>		

INSPECTION TYPE (check each that applies)

- Routine RCRA Compliance Evaluation Inspection**
- Limited RCRA Compliance Evaluation Inspection (Circle items inspected)**
- CEI Follow-up (Circle items inspected)**
- Order Follow-up (Case No./Date _____) (Circle items inspected)**
- Citizen Complaint (Complaint # _____)**

Comments:

Oklahoma Department of Environmental Quality
TSD FACILITY INSPECTION REPORT

EPA ID# _____
DATE _____

I have completed an inspection of your facility to evaluate compliance with the Oklahoma Hazardous Waste Management Act (27A O.S. § 2-7-101, *et seq.*), the Oklahoma Hazardous Waste Management regulations (OAC 252:205) and the federal hazardous waste management regulations (40 CFR Parts 260 – 279).

Based on this inspection, it appears your facility is in compliance with all applicable regulations and statutes, and no further action is required. However, if additional review of the facts established during the inspection reveals areas of non-compliance, I will notify you in writing.

Items marked as “Area of Non-compliance” represent requirements where I have identified the facility to not be in compliance with the applicable statute or regulation. ***Please correct each area of non-compliance and submit documentation to me demonstrating compliance no later than _____.*** If further review of the facts established during this inspection reveals additional areas of non-compliance or that a violation was identified in error, I will notify you in writing. If you believe I have identified an area of non-compliance in error or if additional time is needed, please submit supporting documentation or a request for an extension within this same period.

This Notice in no way limits the DEQ’s authority to pursue additional enforcement such as, but not limited to, an Administrative Order and/or assessment of penalties, based on the nature or gravity of violations found, failure to respond to this Notice, or otherwise in accordance with its statutory authority.

If you have any questions regarding this Notice, please contact me.

(Printed name)

(Signature)

Oklahoma Department of Environmental Quality
Land Protection Division
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