

## Michigan Department of Environment, Great Lakes, and Energy

## INTERIM STATUS TREATMENT, STORAGE, DISPOSAL INSPECTION FORM

Facility's Name			Part 6 Rules
Date	ID#		1994 PA 451
			<del></del>
HAZARDOUS WASTE AND WASTE #		SOURCE	HOW MUCH
	NI – Not Inspected	N/A Not Applicable	
This facility, in addition to being a treatment, storage	ge &/or disposal facility:		
Generates hazardous waste		Transports hazardous waste	
This facility:			
Accepts waste from off-site sources		Handles its own waste	
If applicable, hazardous waste is stored in:		Approximate # of unit(s)	
Container(s) (drums, totes, roll-off boxe Tank(s)	s, etc.)		
Waste pile(s)			
Surface impoundments Other			
If applicable, hazardous wastes are treated in:		Approximate # of unit(s)	
Surface impoundments			
Waste pile(s) Land treatment			
Incinerator Aboveground tank(s)			
Underground tank(s) Containers			
Thermal treatment			
Chemical, physical & biological treatme Other			
If applicable, hazardous waste are disposed in:		Approximate # of unit(s)	
Surface impoundment(s)			
Land treatment Landfill			
Incinerator			

ENVIRONMENTAL & HUMAN HEALTH STANDARDS GENERALLY (Rule 602)		YES	NO.	
1. Is the TSDF operated in a manner that will prevent the following: (Rule 602)				
a) violations of Federal Clean Water Act or Act 451, Part 31? (Rule 602(1)(a)	DPB	[	]	NI N/A
b) air emissions in violation of the Federal Clean Air Act or Act 451, Part 55? (Rule 602(1)(b))	DPB	[	]	NI N/A
c) degradation, as defined in Act 451, Part 31, of a sole-source aquifer? (Rule 602(1)(c))	DPB	[	]	NI N/A
d) exposure of humans/environment to harmful quantities of hazardous waste/constituents? (Rule 602(1)(d))	DPB	[	]	NI N/A
e) pollution, impairment or destruction of natural resources of the state? (Rule 602(1)(e))	DPB	[	]	NI N/A
GENERAL FACILITY STANDARDS (40 CFR 265.12)  NOTE: Rule 601(3) refers to 40 CFR 65, Subpart B, 265.10-265.19				
2. Does the facility have an EPA ID#? (40 CFR 265.11)	DGS	[	]	NI N/A
3. If required, have the following been notified:		[	]	NI N/A
a) Director, of receipt of hazardous waste from foreign source (minimum 4 wks in advance)? (40 CFR 265.12(a))	DGS	[	]	NI N/A
b) the new owner/operator, in writing, of the requirements. (40 CFR 265.12(b))	DGS	[	]	NI N/A
GENERAL WASTE ANALYSIS (40 CFR 265.13)  NOTE: Rule 601(3) refers to 40 CFR 265, Subpart B, 265.10-265.19				
4. Has owner/operator obtained a detailed chemical and physical analysis of the waste? (40 CFR 265.13(a)(1))	DGS	[	]	NI N/A
5. Analysis repeated for accuracy when process change or fingerprints don't match? (40 CFR 265.13 (a)(3)(i-ii))	DGS	[	]	NI N/A
6. Is waste received from off-site inspected/analyzed to determine if it matches the manifest? (40 CFR 265.13(a)(4))	DGS	[	]	NI N/A
7. Does the owner/operator have a detailed waste analysis plan on file at the facility? Does it include:	DGS	[	]	NI N/A
a) the parameters to analyze waste & rationale for selecting these parameters? (40 CFR 265.13(b)(1))	DGS	[	]	NI N/A
b) testing & sampling methods used to obtain representative samples? (40 CFR 265.13(b)(2&3))	DGS	[	]	NI N/A
c) frequency for review or repetition of initial analysis? (40 CFR 265.13(b)(4))	DGS	[	]	NI N/A
d) off-site waste analysis from generator & any other additional analysis required? (40 CFR 265.13(b)(5&6))	DGS	[	]	NI N/A
e) for surface impoundments, exempt from land disposal restrictions under 268.4(a), the following:		[	]	NI N/A
i) sampling of impoundments? (40 CFR 265.13(b)(7)(i)	DGS	[	]	NI N/A
ii) analysis of test data and annual removal of residues? (40 CFR 265.13(b)(7)(ii&iii)(A)(B)(1-2)	DGS	[	]	NI N/A
8. Procedures to inspect/analyze off-site waste for match w/ manifest in waste analysis plan, specifically:				
a) procedure to determine identity of each waste movement at facility? (40 CFR 265.13(c)(1))	DGS	[	]	NI N/A
<ul><li>b) sampling method used to obtain representative sample, if identification method includes samples? (40 CFR 265.13(c)(2))</li></ul>	DGS	[	]	NI N/A
<ul> <li>c) procedures owner/operator of an off-site landfill receiving containerized hazardous waste will use to determine wheth a generator or treater has added a biodegradable sorbent to the container? (40 CFR 265.13(c)(3)</li> </ul>	er DGS	[	1	NI N/A
GENERAL INSPECTION REQUIREMENTS (40 CFR 265.15)  NOTE: Rule 601(3) refers to 40 CFR 265, Subpart B, 265.10-265.19				
<ol> <li>Owner/Operator inspect facility for malfunctions/deterioration/operator errors/discharges of hazardous waste that may affect human health or the environment? (40 CFR 265.15(a))</li> </ol>	DGS	[		NI N/A
10. Owner/operator has a written inspection schedule kept at the facility? And inspect for: (40 CFR 265.15(b)(1&2))	DGS	[		NI N/A
a) monitoring equipment? (40 CFR 265.15 (b)(1))	DGS	[		NI N/A
b) safety & emergency equipment? (40 CFR 265.15 (b)(1))	DGS	[		NI N/A
c) security devices? (40 CFR 265.15 (b)(1))	DGS	[		NI N/A
d) operating and structural equipment (i.e.: dikes, pumps, etc.)? (40 CFR 265.15 (b)(1))	DGS	[		NI N/A
e) types of problems to be looked for (i.e.: leaky fittings, eroding, dike, etc.)? (40 CFR 265.15 (b)(3))	DGS	[	]	NI N/A
f) inspection frequency based on: (40 CFR 265.15(b)(4))				
i) possible deterioration rate of equipment?	DGS	[	]	NI N/A
ii) areas subject to spills daily (such as loading and unloading areas)?	DGS	[	]	NI N/A
11. Does the log contain: (40 CFR 264.15 (d))				
a) date and time of inspection?	DGS	[		NI N/A
b) name of the inspector?	DGS	[	]	NI N/A

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	c) notation of observations made?	DGS	[	]	NI N/A
	d) date and nature of repairs or other remedial actions?	DGS	[	]	NI N/A
	e) records of inspections kept at least 3 years in inspection log at facility?	DGS	[	]	NI N/A
12.	Are malfunctions/deterioration of equipment or structures remedied on schedule which ensures that the problem does not lead to an environmental or human health hazard? And where a hazard is imminent or already occurred was remedial action taken immediately? (40 CFR 265.15(c))	DGS	]	]	_ NI N/A
ΙΟΤ	PERSONNEL TRAINING (40 CFR 265.16) E: Rule 601(3) refers to 40 CFR 265, Subpart B, 265.10-165.19				
13.	Do personnel training records contain the following:				
	a) job title? (40 CFR 265.16(d)(1))	DGS	[	1	_ NI N/A
	b) job descriptions w/ requisite skill, education, qualifications & duties? (40 CFR 265.16(d)(2))	DGS	[	]	_ NI N/A
	c) name of employee filling jobs? (40 CFR 265.16(d)(1))	DGS	[	]	_ NI N/A
	d) descriptions of type & amount of both introductory and continued training? (40 CFR 265.16(d)(3))	DGS	[	]	_ NI N/A
	<ul> <li>e) training designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them w/ emergency procedures, emergency equipment, emergency systems &amp; hazardous waste management procedures (including contingency plan) relevant to their position? (40 CFR 265.16(a)(3))</li> </ul>	DGS	]	]	_ NI N/A
	f) records of training? (40 CFR 265.16(d)(4))	DGS	_	]	NI N/A
	g) new personnel receive required training w/in 6 months & don't work unauthorized until trained? (40 CFR 265.16(b))	DGS	Г	]	NI N/A
	h) personnel training records show personnel have received an annual review of initial training? (40 CFR 265.16(c))	DGS	[	]	NI N/A
	i) program conducted by someone trained in hazardous waste management? (40 CFR 265.16(a)(2))	DGS	Г	]	NI N/A
	j) records kept until closure or 3 years after employee worked at facility? (40 CFR 265.16(e))	DGS	[	]	NI N/A
	GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTE ( E: Rule 601(3) refers to 40 CFR 265, Subpart b, 265.10-165.19  If required, are the following taken:			-	
	a) ignitable/reactive waste separated/protected from ignition sources with "No Smoking" signs? (40 CFR 265.17(a))	DGS	[	]	_ NI N/A
	<ul> <li>b) precautions to prevent reactions which generate extreme heat, fire, gases, damage the facility or other means which could threaten human health &amp; environment? (40 CFR 265.17(b))</li> </ul>	DGS	]	1	NI N/A
IOT	CONTINGENCY PLAN AND EMERGENCY PROCEDURES (Rule 607: 40 CFR 265.5 E: Rule 607(1) refers to 40 CFR Part 264, Subpart 265.50-265.56 E: A portion of this subpart covers rules under "Preparedness and Prevention	0)			
15.	Is the contingency plan & notification immediately implemented whenever a fire, explosion or release of hazardous waste could threaten human health or the environment? (Rule 607(2): 40 CFR 265.51(b))	DCP	[	1	NI N/A
16.	Does the contingency plan contain the following information:				
	a) actions personnel take responding to fires/explosions/any unplanned release of hazardous waste? (40 CFR265.52(a & b))	DCP	[	1_	NI N/A
	b) describe arrangements or attempts to make arrangements agreed to by local police/fire/hospitals/contractors & state local emergency response teams to coordinate emergency services? (40 CFR 265.52(c)) & (40 CFR 265.37 (c))	DCP	[	1_	NI N/A
	c) if local authorities decline to enter into such agreements is the refusal documented? (40 CFR 265.37(b))	DCP	[	]	_ NI N/A
	d) names, addresses & phone numbers (office and home) of all emergency coordinators? (40 CFR 265.52(d))	DCP	[	]	_ NI N/A
	e) list of emergency equipment which includes location, physical description & capabilities? (40 CFR 265.52 e))	DCP	[	]	_ NI N/A
	f) evacuation plan for personnel giving signals(s), evacuation routes & alternate evacuation routes? (40 CFR 265.52(f))	DCP	[	]	NI N/A
17.	Emergency Coordinator and Emergency Procedures:				
	<ul> <li>a) Coordinator(s) familiar w/ all aspects of site operation &amp; emergency procedures (including location of records)? (40 CFR 265.55)</li> </ul>	DCP	[	]	NI N/A
	b) Does the emergency coordinator(s) have the authority to carry out the contingency plan? (40 CFR 265.55)	DCP	[	]	_ NI N/A
	c) If an emergency situation occurred, did the coordinator(s) follow the emergency procedures? (40 CFR 265.56)	DCP	[	1	NI N/A
18.	Plan amendments and copies:				
	<ul> <li>a) Amended for changes in regulations/facility operations/emergency coordinators/emergency equipment, or if plan failed in emergency? (40 CFR 265.54)</li> </ul>	DCP	[	1	NI N/A
	b) Are copies of the contingency plan available on-site and at local emergency organizations? (40 CFR 265.53)	DCP	Г	1	NI N/A

USE OF MANIFESTS (Rule 608: 40 CFR 265.71 & 265.72) YES NO 19. If the facility receives hazardous waste accompanied by a manifest, completes the following: a) signs & dates each copy? (Rule 608(1)(a): 40 CFR 265.71(a)(1)) **DMR** NI N/A **DMR** b) notes any significant discrepancies? (Rule 608(1)(b): 40 CFR 265.71(1)(2)) NI N/A c) immediately gives the transporter one signed copy of the manifest? (Rule 608 (1)(c): 40 CFR 265.72 (a)(3)) **DMR** NI N/A d) sends copy to generator w/in 30 days & MDEQ w/in 10 days after end of month the waste was received? **DMR** (Rule 608(1)(d&f): 40 CFR 265.71(a)(4)) NI N/A e) retains copy on-site for three years from date of delivery? (Rule 608(1)(e): 40 CFR 265.71(a)(5)) **DMR** NI N/A 20. Complied w/ requirement for bulk shipments of hazardous waste by rail/water? (Rule 608(2): 40 CFR 265.71(b)) **DMR** NI N/A 21. Notified Director if a significant discrepancy is not corrected w/ generator w/in 15 days? **DMR** (Rule 608(4)(a,b,c)): 40 CFR 265.72 (a & b)) NI N/A RECORDKEEPING (RULE 609 & 610: 40 CFR 265.73 (265.74) NOTE: Rule 609(1)(a) refers to 40 CFR 264.73 and 40 CFR Part 264, Appendix I 22. Does the owner/operator maintain an operating record on-site with the following information recorded: a) description/quantity of waste received, method and date of treatment/storage disposal? (40 CFR 265.73(b)(1)) **DMR** NI N/A Γ b) location/quantity of waste in facility (cross-referenced to manifest #) on a map? (40 CFR 265.73 (b)(2)) **DMR** NI N/A c) records/results of waste analysis/trial test/monitoring data/inspections? (40 CFR 265.73(b)(3)) **DMR** NI N/A d) reports on incidents that required implementation of the Contingency Plan? (40 CFR 265.73(b)(4)) **DMR** NI N/A e) monitoring, testing or analytical when required? (40 CFR 265.73(b)(6)) **DMR** NI N/A f) closure and post-closure cost estimates? (40 CFR 265.73(b)(7)) **DMR** [ 1 NI N/A g) quantity/date of placement in land disposal unit of waste w/ extension to land disposal restriction? (40 CFR 265.73(b)(8)) **DMR** NI N/A **DMR** h) off-site treatment, copy of generator's notice or certification/demonstration? (40 CFR 265.73(b)(9)) NI N/A i) on-site treatment, notice data (not manifest #) or certification/demonstration? (40 CFR 265.73(b)(10)) **DMR** NI N/A 1 j) off-site land disposal, copy of generator's notice or certification/demonstration? (40 CFR 265.73(b)(11)) DMR NI N/A k) on-site land disposal, notice data (not manifest #) or certification/demonstration? (40 CFR 265.73(b)(12)) **DMR** NI N/A **DMR** I) off-site storage, copy of notice or certification/demonstration from generator? (40 CFR 265.73(b)(13)) NI N/A m) on-site storage, notice information (not manifest #) or certification/demonstration? (40 CFR 265.73(b)(14)) **DMR** NI N/A 23. Are all required records maintained and available for inspection? (Rule 609 (2&3): 40 CFR 265.74(a)) **DMR** NI N/A REPORTING (Rule 610: 40 CFR 265.75-265.77) 24. Submitted a biennial report to RA by March 1 of even years (IC, GM, WR, PS, OI)? (Rule 610: 40 CFR 265.75) **DMR** NI N/A [ 1 25. If hazardous waste is received from off-site, has: (Rule 610(2): 40 CFR 265.76) **DMR** NI N/A a) the facility accepted any waste without a manifest or shipping paper? **DMR** b) If "a" is yes, was the Director provided with "Unmanifested Waste Report" within 15 days? NI N/A 26. Sent in reports for: releases/fires/explosions/ground-water contamination/facility closure? (40 CFR 265.77 (a-c)) **DMR** NI N/A 27. Owner/Operator w/ hazardous waste disposal/treatment on the site of generation submit monthly report within 10 days after the end of each month? (Rule 610(3)) **DMR** NI N/A CLOSURE AND POST-CLOSURE (Rule 613: 40 CFR Subpart G) **NOTE:** Rule 613 refers to 40 CFR 265, Subpart G 265.110-265.120 DCL 28. Does the hazardous waste management facility have a written closure plan and does it identify: NI N/A DCL a) how each hazardous waste unit will be closed? (40 CFR 265.112 (a&b)) NI N/A 1 DCL b) maximum extent unclose during the facility life with description of final closure? (40 CFR 265.112(b)(2)) NI N/A c) maximum inventory of all waste on-site? (40 CFR 265.112 (b)(3)) DCL NI N/A d) description of steps to remove or decontaminate equipment, soils, etc.? (40 CFR 265.112(b)(4)) DCL NI N/A e) description of other closure activities to satisfy closure performance standards? (40 CFR 265.112(b)(5)) DCL NI N/A **DCL** f) schedule w/ time of closure activities for each hazardous waste management unit? (40 CFR 265.112(b)(6)) NI N/A

g) a written closure cost estimate available and was cost adjusted for inflation? (40 CFR 265.142(a&b))

more than 60 days in advance? (Rule 613(2))

29. Did the facility begin partial or final closure of any or all hazardous waste management units w/out notifying the Director

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NI N/A

NI N/A

DCL

DCL

30. Do certain surface impoundment/waste piles have closure plans? (Rule 613(1): 40 CFR 265.118(a&c))	DCL [ ] NIN	N/A
	YES NO	
31. Does the facility have a written post-closure plan? Does the plan identify: (Rule 613.(1): 40 CFR 265.1		N/A
a) description of the planned monitoring activities (i.e., waste piles etc.)? (40 CFR 265.118(c)(1))	DCL [ ] NIN	N/A
b) description of maintenance activities and frequencies for: (40 CFR 265.118(c)(2))	DCL [ ] NIN	N/A
i) integrity of cap/final cover or other containment systems? (40 CFR 265.118(c)(2)(i))	DCL [ ] NIN	N/A
ii) monitoring equipment? (40 CFR 265.118(c)(2)(ii))	DCL [ ] NIN	N/A
c) name/address/phone# of person or office to contact during post-closure care period? (40 CFR 265.1	18(c)(3)) DCL [ ] NI N	N/A
d) a written post-closure cost estimate? (40 CFR 265.142(a))	DCL [ ] NIN	N/A
e) was the post-closure estimate adjusted for inflation? (40 CFR 265.142(b))	DCL [ ] NIN	N/A
32. If changes to approved closure/post-closure plan were made, did the owner/operator first submit a writte make said changes? (40 CFR 265.112(c))	en request to DCL [ ] NI N	N/A
PREPAREDNESS AND PREVENTION (Rule 606: 40 CFR 265 Note: A portion of this Subpart is covered by questions under "Contingency Plan and Emergency Procedures"		
33. Is facility maintained & operated to minimize possibility of fire, explosion, or release of hazardous waste waste constituent? (40 CFR 265.31)	or hazardous DPP Co. said Obsvo	
34. If required, does this facility have the following equipment?		
a) internal communications or alarm systems? (40 CFR 265.32(a))	DPP [ ] NI N	N/A
b) telephone or 2-way radios at the scene of operations? (40 CFR 265.32(b))	DPP [ ] NI N	N/A
c) portable fire extinguishers, fire control, spill control equipment & decontamination equipment? (40 CF	FR 265.32(c) DPP [ ] NI N	N/A
d) adequate volume of water and/or foam available for fire control? (40 CFR 265.32(d))	DPP [ ] NI N	N/A
35. Testing and maintenance of emergency equipment:		
a) Does the owner/operator test & maintain emergency equipment to assure proper operation? (40 CFI	R 265.33) DPP [ ] NI N	N/A
b) Has owner/operator provided immediate access to internal alarms & communication devices when:	(40 CFR 265.34 (a& b)	
i) hazardous waste is being poured, mixed, etc?	DPP [ ] NI N	N/A
ii) one employee on the premises while facility is operating?	DPP [ ] NI N	N/A
c) Adequate aisle space in facility for unobstructed movement of personnel/emergency equipment? 40 (	CFR 265.35) DPP [ ] NI N	N/A
NOTE: Rule 601(3) refers to 40 CFR 265, Subpart B, 265.10-265.19		
36. Is unknowing entry prevented into active portion (unless demonstrated to Director that physical contact/or	disturbance will not cause a violation) b	by:
a) 24-hour surveillance? (40 CFR 265.14(b)(1))	DGS [ ] NIN	N/A
b) artificial or natural barrier and controlled entry? (40 CFR 265.14(b)(2)(iⅈ))	DGS [ ] NIN	N/A
c) "Danger-Unauthorized Personnel Keep Out" sign(s) at entrance? (40 CFR 265.14(c))	DGS [ ] NIN	N/A
USE/MANAGEMENT OF CONTAINERS IN STORAGE (Rule 614: 40 C NOTE: Rule 614 refers to 40 CFR, Subpart I, 265.170-264.176	FR Subpart I)	
37. Is each container labeled or marked clearly:		
a) with the words "Hazardous Waste"? (Rule 614(1)(b))	DGS [ ] NIN	N/A
b) with the hazardous waste number? (Rule 614.(1)(b))	DGS [ ] NI N	N/A
38. Are containers:		
a) in good condition? (40 CFR 265.171)	DGS [ ] NIN	N/A
b) if no, did owner transfer waste or otherwise comply? (40 CFR 265.171)	DGS [ ] NIN	N/A
c) compatible with waste in them? (40 CFR 265.172)	DGS [ ] NI N	N/A
d) stored closed when not in use? (40 CFR 265.173(a))	DGS [ ] NIN	N/A
e) managed to prevent leaks? (40 CFR 265.173(b))	DGS [ ] NIN	N/A
39. Are containers & storage area inspected weekly for leaks and defects? (40 CFR 265.174)	DGS [ ] NIN	N/A
40. Container storage areas have containment designed/operated as follows if waste contains free liquids or	r F020, F021, F022, F023, F026, F027	7:
a) impervious base free of cracks? (40 CFR 264.175(b)(1))	DGS [ ] NIN	N/A
<ul> <li>sloped or otherwise designed to elevate/protect containers from contact with accumulated liquids? (40 CFR 264.175(b)(2))</li> </ul>	DGS [ ] NIN	N/A

	c) containment holds 10% of volume of containers or largest container, whichever is greater? (40 CFR 264.175(b)(3))	DGS	[	1	NI N/A
(	d) run-on prevented unless capacity in excess? (40 CFR 264.175(b0(4))	DGS	[	]	NI N/A
(	e) accumulated liquids (waste/precipitation) removed in a timely manner to prevent overflow?(40 CFR 264.175(b)(5))	DGS	[	]	NI N/A
			YE	S NC	
(	If stored hazardous waste is solid or F020, F021, F022, F023, F026, F027, is the storage area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (40 CFR 264.175(c))	DGS	[	1	NI N/A
	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from property line? (Indicate if waste is ignitable or reactive.) (40 CFR 265.176)	DGS	[	]	NI N/A
43. /	Are incompatible wastes stored in separate containers? (If not, (40 CFR 264.17(b)) applies.) (40 CFR 265.177(a))	DGS	[	1	NI N/A
44.	Are hazardous wastes placed in containers that previously held incompatible material? (40 CFR 265.177(b))	DGS		_ [:	NI N/A
45. I	Incompatible waste separated/protected from each other by physical barriers/ sufficient distance? (40 CFR 265.177 (c))	DGS	[	]	NI N/A
COM	MENTS:				