

LLMW/NARM CHECKLIST

LOW-LEVEL MIXED WASTE (LLMW) ELIGIBLE FOR STORAGE AND TREATMENT CONDITIONAL EXEMPTION

1.	Are the LLMW generated and managed by the generator, treater, or other handler (Handler) of LLMW generated and managed under a single NRC or NRC Agreement State (NRC) License? [3745-266-220(B)]		Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	If no , the waste is not eligible for this storage and treatment conditional exemption. Mixed waste generated at a facility with a different license number and shipped to the Handler's facility for storage or treatment requires a permit and is ineligible for this exemption. In addition, Naturally Occurring and/or Accelerator-produced Radioactive Material (NARM) is ineligible for this exemption.							
2.	Does the Handler of LLMW meet the following conditions for the LLMW qualify for a maintain a storage and treatment exemption: [3745-266-220(C)]							
	a.	Notify Ohio EPA in writing that Handler is claiming a conditional exemption for the LLMW stored at the Handler's facility?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	b.	Dated notification includes the following:						
	i.	Name?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	ii.	Address?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	iii.	U.S. EPA ID#?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	iv.	NRC or NRC Agreement State License?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	v.	Waste code(s) and storage unit(s) handler is seeking exemption for?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	vi.	Statement that Handler meets the conditions of OAC rules 3745-266 to 3745-266-355?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
3.	Does the Handler do the following to maintain an exemption for LLMW:							
	a.	LLMW is stored in tanks or containers in compliance with the requirements of handler's NRC License?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	b.	LLMW is stored in tanks or containers in compliance with the requirements of handler's NRC License?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	c.	The facility personnel who manage stored conditional exempt LLMW are trained and includes personnel training standards found in OAC rule 3745-65-16(A)(3)?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	d.	An inventory of stored conditionally exempt LLMW is conducted at least annually and inspected quarterly for compliance with OAC rules 3745-266-210 to 3745-266-355?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	e.	Maintain an accurate emergency plan?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	f.	Provide an accurate emergency plan to all local authorities who may have to respond to a fire, explosion or release of hazardous waste or hazardous constituents?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
4.	Does the emergency plan:							
	a.	Describe emergency response arrangements with local authorities?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	b.	Describe evacuation plans?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
	c.	List the names, addresses, and telephone numbers of all facility personnel qualified to work with local authorities as emergency coordinators?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>

	d.	List emergency equipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
TREATMENT OF LLMW [3745-266-235]					
5.	Does the Handler treat LLMW in accordance with the terms of their NRC or NRC Agreement State License?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Does the Handler conduct treatment in a tank or container have an Ohio hazardous waste permit?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
RECORD KEEPING FOR LLMW [3745-266-250]					
7.	Does the Handler keep all records required by the NRC?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the Handler keep the following records:				
	a.	Initial notification records?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Return receipts?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Reports to Ohio EPA of failure(s) to meet the exemption conditions?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	All records supporting any reclaim of an exemption?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e.	Records of LLMW annual inventories?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Quarterly inspections?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	g.	Certification that facility personnel who manage stored mixed waste are trained in the following:			
	1.	Safe management of LLMW?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	2.	Training in chemical waste management?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	3.	Hazardous materials incidents response?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	h.	Emergency plan as specified in OAC rule 3745-266-220(C)(2) to (C)(2)(E)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	Does the handler maintain the following records for as long as the exemption is claimed and three (3) years thereafter, or in accordance with NRC regulations under 10 CFR 20 (or equivalent NRC Agreement State regulations), whichever is longer: [3745-266-250(B)]				
	a.	Notification?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Personnel trained?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Emergency plan?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
RE-ENTRY OF LLMW INTO REGULATION AS A HAZARDOUS WASTE [3745-266-255]					
10.	Has the LLMW met the requirement of the NRC License for decay-in-storage?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
11.	Can the LLMW be disposed of as non-radioactive waste?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	If the answers to questions #1 and #2 are yes , the conditional exemption for storage no longer applies. On that date, the waste is subject to hazardous waste regulation under the applicable OAC rules 3745-50, 3745-51, 3745-52, 3745-53, 3745-54 to 3745-57, 3745-65 to 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270.		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

12.	Has the Handler conditionally exempt LLMW from storage, which has been generated and stored under a single NRC or NRC Agreement State License?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: The Handler's conditionally exempt LLMW removed from storage may be eligible for transportation and disposal conditional exemption in OAC rule 3745-266-305.</i>		
TRANSPORTATION AND DISPOSAL CONDITIONAL EXEMPTIONS [3745-266-315]		
13.	Does the Handler of LLMW meet the following conditions for their eligible waste to qualify for and maintain the transportation and disposal conditional exemption:	
a.	Eligible waste (LLMW or NARM waste) meet LDR treatment standards specified in OAC rules 3745-270-40 to 3745-270-49?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Manifest and transport waste according to NRC regulations (NRC 10 CFR 20.2006 and 10 CFR 1.5)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Exempted waste is disposed of in a carbon steel drum or alternative container with equivalent containment performance in the disposal environment as a carbon steel drum, or a high integrity container as Defined by NRC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Exempted waste is disposed of in a LLW disposal facility that is regulated and licensed by NRC under 10 CFR 61 or NRC Agreement State under equivalent state regulations, including state NARM licensing regulations for eligible NARM?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTIFICATION OF TRANSPORTATION AND DISPOSAL EXEMPTION [3745-266-345]		
14.	Did the handler provide a one time written notice to Ohio EPA stating that the handler is claiming the transportation and disposal conditional exemption prior to the initial shipment of an exempted waste from their facility to a LLW disposal facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
If so, did the notice include the following:		
a.	Facility name?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Address?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Phone number?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	U.S. EPA Identification number?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Did the handler send the written notice to Ohio EPA by certified delivery?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	Did the handler notify the LLM disposal facility by certified delivery?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
If so, did the notice include the following:		
a.	A statement that handler has claimed the exemption for the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	A statement that the eligible waste meets applicable treatment standards in OAC Chapter 3745-270?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Facility name, address and U.S. EPA identification number?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	The EPA hazardous waste numbers prior to the exemption of the waste streams?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	A statement that the exempted waste must be placed in a container according to OAC rule 3745-266-315(F) to (F)(3)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	The manifest number of the shipment that will contain the exempted waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
g.	A certification that all of the information provided is true, complete, and accurate that is signed by an authorized representative?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

RECORD KEEPING REGARDING TRANSPORTATION AND DISPOSAL [3745-266-350]

17.	Does the Handler keep all records required by the NRC or NRC Agreement State License?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
18.	Does the Handler keep the following records:			
a.	Records required under OAC rules 3745-54-73, 3745-65-73 and 3745-270-07 to demonstrate that the waste has met LDR treatment standards prior to claiming the exemption?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	All notifications and return receipts required under OAC rule 3745-266-355 for three (3) years after exempted waste is sent for disposal?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	All notifications and return receipts required under OAC rule 3745-266-345(A) for three (3) years after the last exempted waste is sent for disposal?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
19.	If the Handler is not subject to NRC manifest and transportation regulations for the shipment of waste, do they keep all other documents related to tracking the exempted waste as required under 10 CFR 20.2006 or NRC Agreement State equivalent regulations, including applicable NARM requirements?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>