

PART B REVIEW CHECKLIST

SECTION J - CORRECTIVE ACTIONS

Last updated: May 2005

Facility/ID #		Date	
Reviewer		DO	

The application should contain information as required by OAC 3745-50-44 (D). However, this information can be provided by referencing the appropriate document (e.g. RFI, CMS, etc.). This section of the checklist asks questions to help the permit writer complete the draft permit. If US EPA has been regulating corrective actions in the past the permit writer must contact US EPA to determine the transition point, i.e., the point that Ohio will assume corrective action oversight responsibilities.

Relevant Guidance Documents - Ohio EPA Corrective Action Plan (CAP) - <http://epa.ohio.gov/portals/32/pdf/theplan.pdf>, Corrective Action Handbook - <http://epaintra.epa.state.oh.us/dhwm/pdf/CAHandbookJune09.pdf>

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Unit Description OAC 3745-50-44 (D)					☞ For corrective action documents referenced in the application list the document name and date as well as page number.	
<i>Note: The following information can be incorporated into the application by reference to a document submitted by the facility (e.g. RFA, RFI, etc.)</i>						
(1) For each waste unit does the application contain the following:						
a) The location of the unit on the topographic map (in accordance with OAC 3745-50-44 (A)(19))?						
b) A designation of the type of unit?						

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c) General dimensions and structural description (supplying any available drawings)?						
d) Information on when the unit was operated?						
e) Specification of all wastes that have been managed at the unit, to the extent available?						
(2) Has the facility submitted all available information pertaining to any release of hazardous wastes or hazardous constituents from any waste management units?						
(3) Has the facility provided results of sampling of any of the following where the director ascertains it is necessary to complete a RCRA facility assessment that will determine if a more complete investigation is necessary? Which of the following phases does this pertain to:						
a) Ground water?						
b) Land surface?						
c) Subsurface strata?						
d) Surface water?						
e) Air?						

Note: The questions related to the following sections are related to information the permit writer needs to ascertain to complete the permit conditions. In addition, if US EPA is regulating the corrective action process the permit writer must determine what phase corrective actions is in and at what point Ohio EPA will take over the corrective actions.

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Condition E.3 Identification of SWMUs (OAC 3745-54-101)						
(1) Does the facility or the US EPA RFA have a complete list of SWMUs?						
(2) Does the facility or US EPA RFA identify releases of hazardous waste or hazardous constituents?						
(3) Does the facility or US EPA RFA identify potential releases of hazardous waste or hazardous constituents?						
(4) Does the facility or US EPA RFA (PA/VS1 or PR/VS1) identify media of concern?						
Condition E.4 No Corrective Action Required At This Time						
(1) Were no known or potential releases of hazardous waste or hazardous waste constituents associated with identified waste management units? <i>A yes answer indicates that condition E.4 may be applicable.</i>						
(2) Has the facility performed an RFI or is required to perform an RFI? <i>A yes answer indicates that condition E.4 is not applicable.</i>						
Condition E.5 RCRA Facility Investigation (RFI)						
(1) Has the facility submitted an RFI workplan? <i>If yes, indicate the date of the approved RFI workplan in section A of condition E.5. If no, include section A as written in the permit with the appropriate modifications of the language.</i>						
(2) Has the facility implemented the RFI workplan? <i>If yes, indicate the date of implementation in section B of condition E.5. If no, include section B as written in the permit with the appropriate modifications of the language.</i>						

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(3) Has the facility submitted an RFI final report? <i>If yes, indicate the date of the approved RFI final report in section C of condition E.5. If no, include section C as written in the permit with the appropriate modifications of the language.</i>						
Condition E.6 Interim Measure (IM)						
(1) Has the facility completed any interim measures? <i>If yes, Condition E.6 should reference the work that has been done to date. If no, go to the next question.</i>						
(2) Is the facility preparing or in the process of conducting interim measures? <i>If yes, the details and requirements should be incorporated into Condition E.6.</i>						
Condition E.7 Determination of No Further Action						
(1) Has the facility submitted a class 3 permit modification request to terminate the Corrective Action tasks of the Schedule of Compliance?						
(2) Has Ohio EPA terminated the Corrective Action tasks of the Schedule of Compliance based on the results of the completed RFI and other relevant information? <i>If yes, then include information on the termination in section A of condition E.7. If no, include section A as written in the permit with the appropriate modifications of the language. Sections B and C should be included as written.</i>						
(3) Does the facility state that even if no further action has been warranted by Ohio EPA, they will continue to monitor air, soil, and water and perform further investigations at Ohio EPA's request should new information and/or circumstances warrant it?						
Condition E.8 Corrective Measures Study (CMS)						

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(1) Has the facility completed a CMS workplan? <i>If yes, indicate the date of the approved CMS workplan in section A of condition E.8. If no, include section A as written in the permit with the appropriate modifications of the language.</i>						
(2) Has the facility implemented the CMS workplan? <i>If yes, indicate the date of implementation in section B of condition E.8. If no, include section B as written in the permit with the appropriate modifications of the language.</i>						
(3) Has the facility completed the CMS final report? <i>If yes, indicate the date of the approved CMS final report in section C of condition E.8. If no, include section C as written in the permit with the appropriate modifications of the language.</i>						
Condition E.9 Corrective Measures Implementation (CMI) Condition E.10 Newly Identified SWMUs or Releases Condition E.11 Corrective Action for Newly Identified SWMUs and Releases						
These conditions are to be incorporated into the permit (with appropriate modifications).						