

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

Facility Name
Location

Date and Time

RECORDS/DOCUMENTS REQUEST

GENERAL PROCEDURE

The EPA inspection will proceed in two stages. First, EPA will identify various records to be reviewed. Generally, these records will date back three years from the present, but some of the records will be for other specific time periods. Second, according to a schedule to be developed on site, EPA will review the records and request copies, as needed. The following documents are requested to be made available during the inspection. Other records may be identified for review during the inspection. **Please be aware that this request is somewhat generic in nature and all of the information requested may not be applicable to your facility.**

GENERAL

1. Facility map and plot plan.
2. Organizational chart (including environmental department)
3. Description of facility and operations
4. List of on-site laboratories and types of analyses conducted
5. Inventory of chemicals and quantities purchased during the last three (3) years
6. Enforcement actions/Notices of violations (NOVs, NONs)
7. Consent Decrees/Orders/Agreement and related correspondence
8. Environmental projects/funding summary

RESOURCES CONSERVATION AND RECOVERY ACT (RCRA)

1. RCRA Part A Permit Application (original and any revisions).
2. Determinations for whether any solid wastes generated are hazardous wastes and any waste analysis data or other documentation supporting the determinations. Include documentation of any analytical results of waste (including wastewaters) generating at the facility, including EP and TCLP toxicity testing, corrosivity testing, and testing which

establishes whether or not a material meets the definition of a characteristic waste. Include any waste analysis data or other documentation which establishes whether or not any used oil generated on-site meets the used oil specification.

3. EPA identification numbers allowing the facility to treat, store, dispose of, transport, or offer for transportation any hazardous wastes.
4. Manifests for any hazardous wastes transported, accepted, or offered for transportation off-site (manifests for the past three years) including Land Disposal Restriction notifications and certifications (past three (3) years).
5. Biennial reports for shipping any hazardous wastes off-site to a treatment, storage, or disposal facility or for treating, storing, or disposing of any hazardous wastes on site (last two (2) reports).
6. Exception reports for any manifests not received back from the designated facility (last three (3) years).
7. Un-manifested waste reports for any hazardous wastes received from off-site without accompanying manifests.
8. Notifications for any hazardous wastes intended to be exported.
9. Any notifications, pre-compliance and compliance certifications submitted for burning of hazardous wastes in boilers or industrial furnaces.
10. Analytical results and accumulation records for any recyclable material utilized for precious metal recovery.
11. Schedule and logs for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting, or responding to environmental or human health hazards.
12. Employee training records for hazardous waste handlers, **including job titles and descriptions**, names of each employee, and documentation of the type and amount of training each has received. Provide a copy of the hazardous waste training plan.
13. Current Contingency Plan including summary reports and documentation of incidents that require implementation of the contingency plan (past three (3) years).
14. Methods and dates for treating, storing, or disposing of any hazardous wastes at the facility.
15. Location and quantity of each hazardous waste within the facility.

16. Plot plan showing locations of all less than 90 or 180 days accumulation areas and tanks. Also, identify locations of all waste operation points and satellite accumulation areas.
17. Inspection schedules, logs/summaries for all container storage areas and less than 90 days accumulation areas (last three (3) years).
18. Groundwater sampling and analysis plan for any impoundment, landfill, or land treatment facilities on-site.
19. Outline of ground water quality assessment program for any impoundment, landfill, or land treatment facilities on-site.
20. Ground water analysis and reports for any impoundment, landfill, or land treatment facilities on-site.
21. Closure and post-closure plans for any hazardous waste disposal facilities, waste piles, surface impoundments, tanks, or landfills
22. Certifications for any hazardous waste disposal facilities, waste piles, surface impoundments, tanks or landfills that have been closed.
23. Certifications for any post-closure care that has been completed on any hazardous waste disposal facilities, waste piles, surface impoundments, tanks or landfills.
24. Certified assessment of integrity for any existing tank systems used for storing for treating hazardous waste that do not have secondary containment.
25. Certified assessment of design and construction for any new tank systems used for storing or treating hazardous waste.
26. Certified statements for any tank systems used for storing or treating hazardous waste that have been repaired.
27. Inspection schedules, logs, summaries for all tank systems, surface impoundments, and waste piles used for storing or treating hazardous waste (last three (3) years).
28. Notification and reports of any hazardous waste releases to the environment.
29. Hazardous waste minimization plan and certification of program which reduces the volume and toxicity of hazardous waste.

UNDERGROUND STORAGE TANKS

1. List of all underground storage tanks (USTs) ever in operation including tanks currently in operation, temporarily closed or permanently closed. The list should include location, age, construction material, and current status.
2. Notifications for any underground storage tanks.
3. Certifications for any new underground storage tanks.
4. Reports of any releases, spills, or overfills from underground storage tanks.
5. Reports summarizing initial abatement steps, site characterization and free product removal at confirmed release sites.
6. Corrective action plans required as a result of any releases, spills, or overfills from underground storage tanks.
7. Notifications of any underground storage tank changes, upgrades, or closures.
8. Documentation of operation for any corrosion protection equipment required on underground storage tanks.
9. Documentation of any underground storage tank repairs.
10. Documentation for complying with any underground storage tank release detection requirements.
11. Results or any site investigations conducted upon closure of any underground storage tanks.
12. Financial responsibility documentation for USTs.

TOXIC SUBSTANCES CONTROL ACT (TSCA) (If applicable)

Polychlorinated Biphenyls (PCBs)

1. List or description of any PCB items or PCB storage areas.
2. Monthly inspection records for storage areas subject to 40 C.F.R. § 761.65.
3. PCB Transformers and hydraulic systems inventory with location map

and PCB analyses.

4. Inspection and maintenance records for PCB Transformers and hydraulic systems for the last three (3) years.
5. Notification to EPA of PCB activity (EPA Form 7710-53).
6. Copy (ies) of PCB Transformer Registration (s).
7. Copies of all uniform Hazardous Waste Manifests for PCB waste transported off-site since 2001.
8. Copies of PCB Annual Document logs.

TOXIC SUBSTANCES CONTROL ACT (TSCA) - Lead-based Paint

1. Lead-based paint disclosures.

CLEAN WATER ACT (CWA)

1. Current pretreatment permit application (s) including industrial, sanitary, and storm water including any information on changes in process waste streams since permit application submittal.
2. Pretreatment permit (s) effective during the last three (3) years.
3. Exceptions/exemptions from current pretreatment permit requirements.
4. Copies of all reports/plans required by pretreatment permit including: best management plans (BMPs), water quality impact assessments, toxicity studies, sludge management, spills plans, etc.
5. Any compliance order, schedule, penalty assessment, or other enforcement action issued in the last three (3) years and related correspondence.
6. Discharge monitoring reports (DMRs) for the last three (3) years. Written calibration procedures for flow measuring and recording equipment: include industrial, storm, sanitary, or any other sewers on facility property. The written sampling, preservation and chain of custody procedures should also be provided. Sampling and analysis records. Analytical records to include review of analytical procedures, quality control practices, and tracking of raw data through DMR preparation.

7. Any correspondence regarding exceedance of discharge limitations during the last three (3) years.
8. Most recent inspection report and response.
9. All plans and/or written description of the sewer system (including by-pass capability), outfall locations, and monitoring stations.
10. Copies of any other pretreatment or sewer use ordinances or permits.
11. Identify all septic systems, including those no longer in service.
12. Operation and Maintenance manuals for Industrial Wastewater Treatment Plant.
 13. Spill Prevention, Control and Countermeasure (SPCC) Plan
 14. Storm Water Pollution Prevention Plan.

FEDERAL INSECTICIDE, FUNGICIDE, and RODENTICIDE ACT

1. List of restricted use pesticides (including anti-fouling paints).
2. Any records or other documentation regarding pesticide application.

CLEAN AIR ACT

1. Plot plan of the facility showing location and identification of all major process areas and stacks.
2. Brief descriptions for all process areas to include:
 - (a) simplified process flow diagrams
 - (b) pollution control equipment
3. Permits and/or variances for air emission sources and related correspondence.
4. MACT correspondence and applications to the State if applicable.
5. Consent Decrees/Orders/Agreements still in effect.
6. Fuel oil usage - gallons/year to include the sulfur content of the oil (including certificate of analysis).

7. Stack tests (most recent) and stack and ambient monitoring data.
8. Performance specification tests for continuous emission monitors.
9. State emissions inventory report for the last four (4) years.
10. Any project modification/re-construction information.
11. Procedures/manuals for the operation and inspection of pollution control equipment.
12. Required notices and any other pertinent records related to asbestos demolition/renovation projects in progress or completed within the last four years.
13. Any facility inspection reports (federal, state and internal)
14. Excess emission reports for the last four (4) years.
15. Paint usage - gallons/year.
16. Paint compound records to include compound names and CAS Numbers (including MSDS sheets).
17. Provide the facility CFC compliance program relative to disposal, maintenance, and handling of CFC containing equipment.

SARA TITLE III SECTION 313 - EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT

1. 2004 year end chemical purchase summary (printouts). Include in this summary chemical names with Chemical Abstract Service (CAS) numbers and total quantities purchased in 2004.
2. 2003 and 2004 year end chemical inventory summaries (printouts). Include in this summary chemical names with CAS numbers.
3. Invoice, sales, shipping records, and/or supplier notification of toxic chemicals listed under the SARA Title III Section 313 rule.
4. EPA Form R submissions with supporting documents, including manufacturing and usage calculations as well as release calculations and/or measurements for the years 2003, 2004 and 2005.

ENVIRONMENTAL MANAGEMENT SYSTEM

1. EMS Manual.