UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: March 27, 1981

SUBJECT: RCRA/ISS Inspection of USS Lead Refinery, Inc.
in East Chicago, Indiana

FROM: Richard E. Boice, Chemical Engineer, EEIB
THROUGH: Phyllis A. Reed, Deputy Chief, EEIB

TO: Rich Shandross, SIO Indiana, WMB

Attached is the inspection report for the above subject. Major concerns are unprotected waste piles and incomplete manifest forms. Pictures of the site will be forwarded when developed. For additional background information and description of other problems at the plant refer to the April 8-9, 1980, the August 27, 1980 and the October 17, 1980 reports by Robert J. Gnaedinger, Jr. from EEIB.

Attachments
(1) Remarks
(2) RCRA inspection report
(3) Description and disposition of hazardous wastes on site
(4) Manifest form
(5) Results of extraction test on slag and acid neutralization residue.

cc: Bill Miner

EPA Region 5 Records Ctr.
308192

REMARKS

(1) Because no hazardous wastes are accepted from off-site and processes are unlikely to change the requirements for a waste analysis are minimal. Mr. Smolemn agreed to write up something to satisfy these requirements.

(2) Storage, safety and operational components are observed but usually not formally inspected and recorded. Mr. Smolemn seemed agreeable to setting up these inspections and records.

(3) Mr. Bidwell explained that employees are informed of the hazards of lead including use of a film, but no formal training schedule is written up. Operators of the neutralization facility receive on-the-job training, but again nothing is written down. The company does not use job descriptions.

(4) Requirements of a contingency plan are minimal at this plant. Mr. Smolemn agreed to write up something to satisfy the requirements. Leaks from the acid ~~storage~~ neutralization is contained inside the building.

(5) Pictures of the waste piles were taken and will be forwarded. Mr. Bidwell assured me that the K069 wastes is not easily airborn. However, from my observations, it was clear that the dust is very fine and capable of being airborn. In addition, the dust was spread all around the waste pile area and can be kicked up by passing vehicles.

(6) We observed only the acid neutralization tank not the acid collection. The neutralization tank appeared all right but Gnaedinger reported corrosion of concrete surfaces of the acid collection facility in his October 17, 1980 report.

(7) Slag from the blast furnace is used for fill on the site. A contracted lab ran the extraction test on the slag and determined it to be below the RCRA lead limit.* The test on the acid neutralization residue showed it to be above the RCRA lead limit. Mr. Smolemn stated that reference data indicates that the rubber ease material will not pass the extraction test for lead. See lab analyses attached.

* But only just below based on an average. See lab results attached.

STATE IDENTIFICATION NUMBER
(If Applicable)

EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: U.S.S Lead Refinery, Inc.

(B) Street: 5300 Kennedy Avenue

(C) City: East Chicago (D) State: Indiana (E) Zip Code: 46312

(F) Phone: (219) 397-1012 (G) County: Lake

(H) Operator: Same as A-F above.

(I) Street: _____

(J) City: _____ (K) State: _____ (L) Zip Code _____

(M) Phone: _____ (N) County: _____

(O) Owner: Same as A-F above.

(P) Street: _____

(Q) City: _____ (R) State: _____ (S) Zip Code: _____

(T) Phone: _____ (U) County: _____

(V) Date of Inspection: March 25, 1981 Time of Inspection (From) 11:00AM (To) 4:00 PM

(X) Weather Conditions: 50°F; partly sunny.

Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
Derek Steels	Plant Engineer	(219) 347-1012
Tael Smalenn	Vice President Mfgr.	"
Donald Bidwell	Vice President & General Manager	"

(Z) Inspection Participants	Agency/Title	Telephone
Richard E. Boice	USEPA, S+A, EEIB Chemical Engineer	(312) 886-6226
Karen A. Waldvogel	USEPA, S+A, EEIB Environmental Engineer	(312) 886-3343

(AA) Preparer Information

Name	Agency/Title	Telephone
Richard E. Boice	USEPA, RV. S+A, EEIB Chemical Engineer	(312) 886-6220

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment
- ✓1. Containers (I)
- ✓2. Tanks (J)
- 3. Surface Impoundments (K)
- ✓4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

X D. Incineration and/or Thermal Treatment (O and P)

X E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	—	NA
2. Facility expansion?	—	—	—	NA
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X	—	—	(7)
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	X	—	(1)
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	—	NA
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X	—	—	
2. Artificial or natural barrier around facility?	X	—	—	
3. Controlled entry?	X	—	—	
* 4. Danger sign(s) at entrance?	X	—	—	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	X	—	(2)
2. Records of operator error?	—	X	—	(2)
3. Records of discharges?	—	—	—	None

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	___	X	___	(2)
5. Safety, emergency equipment?	___	X	___	(2)
6. Security devices?	X	___	___	
7. Operating and structural devices?	___	X	___	(2)
8. Inspection log?	___	X	___	(2)
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	X	___	___	
2. Job descriptions?	___	X	___	(3)
3. Description of training?	___	X	___	(3)
4. Records of training?	___	X	___	(3)
5. Have facility personnel received required training by 5-19-81?	X	___	___	verbal
6. Do new personnel receive required training within six months?	X	___	___	verbal
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	X	___	___	
2. No smoking signs?	___	___	___	NA
3. Separation and protection from ignition sources?	___	___	___	NA

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	—	X	—	
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	X	—	—	Autocall to page.
2. Telephone or 2-way radios at the scene of operations?	X	—	—	Telephone system ~~in each shop~~
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X	—	—	

Indicate the volume of water and/or foam available for fire control:

_____

_____

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	—	X	—	(2)
2. Is emergency equipment maintained in operable conditions?	X	—	—	verbal
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	—	—	—	Not required

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? X

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)		X		(4)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?		X		(4)
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?		X		(4)
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?		X		(4)
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)		X		(4)

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	—	X	—	(4)
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	—	X	—	(4)
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	—	X	—	(4)
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	—	X	—	(4)
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	—	—	—	NA

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				No hazardous wastes are accepted from off-site.
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	—	—	—	
2. Are records of past shipments retained for 3 years?	—	—	—	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	—	—	—	

*Not Inspected

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?	X		
2.	Does the operating record contain the following information:			
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	X		
c.	The location and quantity of each hazardous waste within the facility?	X		
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)			NA
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X		
f.	Reports detailing all incidents that required implementation of the Contingency Plan?			NA
g.	All closure and post closure costs as applicable? (Effective 5-19-81)			

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	—	—	—	
2. Has this plan been submitted to the Regional Administrator	—	—	—	
3. Has closure begun?	—	—	—	
4. Is closure estimate available by May 19, 1981?	—	—	—	
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)	—	—	—	

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: USS Lead Date of Inspection: 3/25/81

Dumpster for holding acid treatment residue prior to transport to disposal area.

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X	—	—	
2. Are containers compatible with waste in them?	X	—	—	
3. Are containers stored closed?	X	—	—	
4. Are containers managed to prevent leaks?	X	—	—	
5. Are containers inspected weekly for leaks and defects?	—	X	—	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	—	—	—	NA

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	X	—	—	----------
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	—	—	—	None present

Tanks holding acid for treatment.

J
TANKS

Facility Name: USS Lead Date of Inspection: 3/25/81

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	~~X~~	X	—	(6)
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	X	—	—	----------
3. Do continuous feed systems have a waste-feed cutoff?	—	—	—	NA
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	X	—	—	----------
5. Are required daily and weekly inspections done?	X	—	—	----------
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	—	—	—	NA
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	—	—	—	NA

*Not Inspected

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: NA gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K

SURFACE IMPOUNDMENTS

Facility Name: _____ Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	___	___	___	_____
2. Do earthen dikes have protective covers?	___	___	___	_____
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	___	___	___	_____
4. Is the freeboard level inspected at least daily?	___	___	___	_____
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	___	___	___	_____
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	___	___	___	_____
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	_____

L

WASTE PILES

Facility Name: USS Lead Date of Inspection: 3/25/81

K064 - Emission Control Dust from secondary lead smelting

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?		X		(5)
2. Is each in-coming movement of waste analyzed before being added to the waste pile?		NA		None accepted from off-site
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)		X		
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				NA
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?				NA
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				NA
7. Are piles of imcompatible waste protected by barriers or distance from other waste?				NA

*Not Inspected

M

LAND TREATMENT

Facility Name: _____ Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?	---	---	---	---
2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?	---	---	---	---
3. Is waste analyzed according to 265.273?	---	---	---	---
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	---	---	---	---
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	---	---	---	---
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	---	---	---	---
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	---	---	---	---
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	---	---	---	---
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)	---	---	---	---

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	----------
**2. Collection of run-off from active portions of the fill?	---	---	---	----------
**3. Is collected run off treated?	---	---	---	----------
4. Control of wind dispersal of hazardous waste?	---	---	---	----------
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	----------
2. The contents of each cell and the location of each hazardous waste type withing each cell?	---	---	---	----------
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	----------
2. Has this plan been submitted to the Regional Administrator?	---	---	---	----------
3. Has closure begun?	---	---	---	----------
4. Is closure cost estimate available by 5-19-81?	---	---	---	----------
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	___	___	___	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	___	___	___	_____
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	___	___	___	_____
2. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
3. Does the landfill have a functional leachate collection system?	___	___	___	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	_____

*Not Inspected

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

_____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

	Component	Yes	No	NI*	Remarks
1.	_____	___	___	___	_____
2.	_____	___	___	___	_____
3.	_____	___	___	___	_____
4.	_____	___	___	___	_____
5.	_____	___	___	___	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

	1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
	a. Heating value	___	___	___	_____
	b. Halogen content	___	___	___	_____
	c. Sulfur content	___	___	___	_____

*Not Inspected

2. Has documented or written data been substituted for analysis of either:

   a. Lead? ___ ___ ___ _____

   b. Mercury? ___ ___ ___ _____

B. List other parameters for which the waste is tested to enable owner or operator to establis steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
B. Is steady state maintained or corrections attempted?	___	___	___	_____
C. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
G. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

*Not Inspected
**Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	___	___	___	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: USS Lead

Date of Inspection: March 25, 1980

Acid neutralization (contaminated with lead)

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	X	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	___	NA

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	X			
4. Are inspection procedures followed according to 265.403?		X		- (2)
5. Are the special requirements fulfilled for ignitable or reactive wastes?				NA
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)		X		

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

D008 - acid treatment residue is presently the only hazardous waste disposed of off-site.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X			
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X			
2. Name, mailing address, telephone number, and EPA ID Number of Generator		X		No EPA ID number Mr. Smolenski said he would add it right away.

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	X			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?		X		Mr Smolenn said would add it.
6. The total quantity of waste(s) and the type and number of containers loaded?	X			Always one dumpster at a time
7. Required certification?		X		Mr. Smolenn said would add it right away.
8. Required signatures?	X			
(C) Does the owner or operator submit exception reports when needed?				NA

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	X			
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)		X		DOT Haz waste descriptio not on package.
(C) If required, are placards available to transporters of hazardous waste?				None required

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	___	___	___	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	___	___	___	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	___	___	___	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	___	___	___	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	___	___	___	_____
c. Do continuous feed systems have a waste-feed cutoff?	___	___	___	_____
d. Are required daily and weekly inspections done?	___	___	___	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	___	___	___	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	___	___	___	_____

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	X			
(B) Has the generator submitted Annual Reports and Exception Reports as required?				NA

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		X		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

TRANSPORTER REQUIREMENTS
40 CFR Part 263

NA

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	___	___	___	_____

II. INTERNATIOINAL SHIPMENTS

	Yes	No	NI*	Remarks
A. Does the transporter record on the manifest the date the waste left the U.S.?	___	___	___	_____
B. Are signed completed manifest(s) on file?	___	___	___	_____

V. MISCELLANEOUS

	Yes	No	NI*	Remarks
A. Does transporter transport hazardous waste into the U.S. from abroad?	___	___	___	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Description and disposition of hazardous wastes on location

Waste #	EPA HAZARD. WASTE #	Estimated Quantity or Rate (of TSD)	Units of Measure	Process Codes for handling of the waste	Additional Waste Descriptic (if any)
1	K069	5000	Y	S03T04	T04- Dust is conveyed to a slag in a furnace and then added to blast furnace to recover Pb & Cu. lead source. The dust appears to be a lead
2					
3					
4					
5	D008			S01	Acid treatment residue put in a dumpster & then transported off-site
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					

SOLID WASTE EXTRACT RESULTS

U. S. S. LEAD REFINERY, INC.
East Chicago, Indiana

RCI Solid Waste No.	16832	16836	16837	16838
Date Received	10/31/80	10/31/80	10/31/80	10/31/80
RCI Extract Sample No.	16857	16858	16859	16860
Extract Analyses, mg/l:				
Arsenic	< 0.002	< 0.002	< 0.002	< 0.002
Barium	< 0.05	< 0.05	< 0.05	< 0.05
Cadmium	0.17	0.024	0.031	< 0.003
Chromium	< 0.01	< 0.01	< 0.01	< 0.01
Lead	36	3.5	3.5	6.0
Mercury	< 0.0002	< 0.0002	< 0.0002	< 0.0002
Selenium	< 0.005	< 0.005	< 0.005	< 0.005
Silver	< 0.005	< 0.005	< 0.005	< 0.005

Sample Identification:

RCI No. 16832 - Equal weight composite of samples A, B, and C, $CaSO_4$ residue from neutralization system.

RCI No. 16836 - Start Tap No. 1

RCI No. 16837 - Middle Tap No. 2

RCI No. 16838 - End Tap No. 3

NOTE: Samples 16836, 16837, and 16838 were collected afternoon of 10/26/80 and were subjected to structural integrity procedure prior to extraction.

RESOURCE CONSULTANTS

SOLID WASTE EXTRACT RESULTS

U.S.S. LEAD REFINERY, INC.
East Chicago, Indiana

RCI Solid Waste No.	16833	16834	16835
Date Received	10/31/80	10/31/80	10/31/80
RCI Extract Sample No.	17279	17280	17281
Extract Analyses, mg/l:			
Arsenic	0.012	< 0.002	< 0.002
Barium	0.15	< 0.05	< 0.05
Cadmium	< 0.003	< 0.003	< 0.003
Chromium, total	< 0.01	< 0.01	< 0.01
Lead	4.1	7.6	5.2
Mercury	< 0.0002	< 0.0002	< 0.0002
Selenium	< 0.005	< 0.005	< 0.005
Silver	< 0.01	< 0.01	< 0.01

Sample Identification:

RCI No. 16833 - Start Tap No. 1

RCI No. 16834 - Middle Tap No. 2

RCI No. 16835 - End Tap No. 3

NOTE: Samples 16833, 16834, and 16835 were collected the morning of 10/26/80 and were subjected to the structural integrity procedure prior to extraction.

RESOURCE CONSULTANTS

Gary Avenue
Chicago, Indiana 46312

WASTE TRACKING FORM

Emergency Phone
(219) 397-20[illegible]

ERATOR IDENTIFICATION	2. SPECIAL HANDLING INSTRUCTIONS (if any)
U. S. S. LEAD REFINERY, INC. 5300 KENNEDY AVENUE EAST CHICAGO, INDIANA 46312	NONE
CRIPTION & QTY. OF WASTE SHIPMENT 4000 Gal. Calcium Sulfate Liquid	**4. AUTHORIZATION OF WASTE SHIPMENT** NAME: Claudette B. Peak TITLE: Receptionist DATE: 3/9/81 SIGNATURE: Claudette B. Peak TELEPHONE: (219) 397-1012
POSAL SERVICE IDENTIFICATION RIAL DISPOSAL CORPORATION ox 59 ary Avenue icago, Indiana 46312 NE #: 219-397-2664 ATION #: IND.—044250687	**6. ACKNOWLEDGEMENT OF RECEIPT OF WASTE SHIPMENT** NAME: TITLE: DATE: SIGNATURE:
OSAL SITE IDENTIFICATION GARY DEVELOPMENT LANDFILL 479 NORTH CLINE AVENUE GARY, INDIANA 46406 NE #: (219) 944-7858 : IND 077005916	**8. ACKNOWLEDGEMENT OF RECEIPT OF WASTE SHIPMENT** NAME: TITLE: DATE: SIGNATURE:

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