

| # | Physical Location(s)  | Aspect Reviewed  | Regulatory Requirement  | Key Questions  |
|---|---|--|---|--|
| 1 | Emergency generator area, oil racks in hazmat storage room.             | Oil storage (fuel and lube).   | Have an SPCC plan if above ground single tank exceeds 660 gal, or aggregate tanks or containers exceed 1320 gallons. 40 CFR 112.2(b) and (d)                | Generator burns natural gas or propane (no tank)?<br>Generator tank capacity < 660 gal?<br>Total oil storage above ground < 1320 gal?<br>Total oil storage in underground tanks < 42,000 gal?  |
| 2 | Potential accidental chemical releases.                                 | Water treatment chemicals in utility room, oils/solvents in hazmat storage room. | Spill prevention and control. RCSA 22a-430-3(p)   | No floor floods in high water conditions?<br>No chemicals stored next to floor drains?<br>No breakable containers, gauges or other sources?  |
| 3 | Water discharges to surface waters or sanitary sewer line.              | Drains for wastewaters and potential spills.                                     | No discharge without a NPDES or state permit. 40 CFR 122.21, RCSA 22a-430-4(a)(1)   | Map/drawing available of plumbing/discharges?<br>All actual and potential discharge points identified?<br>Clear instructions to personnel on no dumping?<br>All discharges covered by general or other permit?                                     |
| 4 | All permitted water discharges.   | Water discharges required to be sampled and analyzed.                            | Record date, location and time of each sampling or measurement. 40 CFR 122.21 and 122.41(j)(3)(ii)  | Facility has stormwater or other general permits?<br>Permit sampling requirements known?<br>Sampling schedule/reminder system set up?<br>Logsheets and reporting format established?   |
| 5 | Facility process areas, boiler/utility room.                            | Drains for wastewaters and potential spills.                                     | Operate under general permit (e.g., <i>Minor Boiler Blowdown, or Minor Non-Contact Cooling Water, or Minor Tumbling and Cleaning</i> ) RCSA 22a-430-4(a)(1) | No open floor drains / uncontrolled route outside?<br>Sink drains used only for sanitary?<br>No maintenance blowdown / backflushes to drains?<br>No wastewaters generated from water treatment?<br>Permit on file, and copy available at facility? |
| 6 | Outside areas subject to stormwater runoff.                             | Stormwater permit and runoff pollution prevention plan.                          | Operate under general permit for <i>Discharge of Stormwater Associated with Industrial Activity</i> RCSA 22a-430-4(a)(1)                                    | Facility SIC indicates plant is covered?<br>No chemicals / materials exposed outside?<br>Does an SWPP plan exist?<br>Does the plan cover all the requirements?   |
| 7 | Facility, groundwater treatment system or soil vapor extraction system. | Entrained water removed, separated or treated, and drummed if not dischargeable  | Operate under DEP temporary or emergency authorization, or under general permit if water is discharged. CGS 22a-430b  | Is drummed water pumped out to a tanker truck?<br>Is water properly identified (as CR02 or hazwaste)?<br>Are manifests / test results available for review?<br>Is removed water treated and pumped to sewer line?                                  |

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| 8 | Facility.            | New interceptor well.                         | Operate under DEP temporary or emergency authorization, or under general permit. CGS 22a-430b | <p>Temporary or emergency authorization applied for?</p> <p>Is a copy of it on file / available?</p> <p>Is periodic discharge sampling done as required?</p> <p>Are all stated effluent limits met by each sample?</p> |
| 9 | Facility.            | New interceptor well, water diversion permit. | Operate under water diversion permit if flow is substantial. RCSA 22a-377(c)-1                | <p>Is planned/possible flow &gt; 50,000 gpd?</p> <p>If so, is copy of permit available at facility?</p>  |