

Chapter 7

REPORTING REQUIREMENTS

1. DEPARTMENT OF THE ARMY REPORTS.

a. HAZARDOUS MATERIAL INVENTORY

(1) An accurate hazardous material inventory provides management with essential information about the processes that use the materials. Inventories are needed for:

- P2 reporting requirements
- Generating and maintaining an AUL
- Assessing processes for P2 opportunities
- Measuring success in minimizing hazardous material use
- Hazard Communications requirements

(2) The EPOC or Supply Sergeant and the State Maintenance Workers must track the annual purchasing, use and storage of HM. To do so,

STEP 1. Conduct an inventory of every storage locker, room, warehouse, or rack at least once a year.

STEP 2. Obtain and complete an Inventory Form as shown in the figure on page 3-12 (AGO Form 200-1-3). A copy of the form is available in the Environmental Compliance Notebook (ECN) ORARNG Pam 200-1 Chapter 7 or through the following Microsoft Outlook path: Public Folders, All Public Folders, AGI-Installations, Environmental Branch, Forms.

STEP 3. Check that every container, bottle, can, box, etc. is labeled with

- The product name
- Any warning of physical or health hazards listed on the MSDS
- Check the expiration, inspection, or testing dates on all HMs and manage as explained in the Shelf-Life section.

STEP 4. Replace any labels that are missing or unreadable.

*Rotate containers on shelves so that those HMs nearing expiration are placed in front.
Remember FIRST IN, FIRST OUT (FIFO).*

STEP 5. Update the Inventory Form located in a plastic sleeve located on the door of the storage room, locker, warehouse, and near the racks.

Send a completed current HM inventory form to AGI-ENV annually NLT 1 February. Retain copies on file for five years.

(d) How Used - Column 4

Describe the generation process (e.g. painting, equipment maintenance, grounds maintenance, etc.)

(e) Size of Container - Column 5

Enter the size of the container in the space provided (e.g. 5-gal pail, 2 lb box, 20 lb bag, etc.).

(f) Annual Usage - Column 6

Enter the annual usage amount that represents the total amount of material that was used during the reportable year.

(g) Max Amt on hand - Column 7

Enter the maximum amount of hazardous material located at the facility at any one time during the reportable period.

(h) Qty on hand - Column 8**b. HAZARDOUS WASTE INVENTORY**

(1) AR 200-1 Chapter 5 paragraph 5-5 requires that each facility generating hazardous waste maintains an inventory of hazardous waste. This inventory will cover waste that is generated, treated, stored, disposed, or transported off-site by the generating activity. EPOCs will prepare this report annually and submit copies to AGI-ENV no later than 1 March of each year. Report requirements are satisfied when the DEQ HW Determination Worksheet has been completed and submitted to AGI-ENV. (AGO Form 200-1-6)

2. ENVIRONMENTAL PROTECTION AGENCY REPORTS:

a. LQGs must submit an Exception Report to the EPA Regional Administrator IAW 40 CFR 262.42, if a copy of the manifest with the handwritten signature of the owner or operator of the designated facility has not been received within 45 days of the date the HW was accepted by the initial transporter.

b. SQGs must submit an Exception Report to the EPA Regional Administrator IAW 40 CFR 262.42 if a copy of the manifest with the handwritten signature of the owner or operator of the designated facility has not been received within 35 days of the date the waste was accepted by the initial transporter. An exception report for SQGs can consist of a legible copy of the manifest and a written note that delivery of the HW to the Designated Facility shown on the manifest was not received.

c. An exception report will be coordinated with AGI-ENV, Attn: HW Manager, and

submitted to the:

Regional Administrator
US EPA Region X
1200 Sixth Avenue
Seattle, WA 98101

d. Weekly inspections of all indoor and outdoor areas where hazardous materials and regulated wastes are used or stored must be conducted and documented to ensure that stock is rotated, containers are properly labeled, spill control materials are available, and spills have been cleaned up and reported correctly on AGO Form 200-1-8 (ORARNG Facility Weekly Inspection Sheet). Reproducible forms can be found in ORARNG Pam 200-1 Chapter 8.

Requirements include inspecting bulk fuel tanks (mobile and stationary), oil-water separators, flammable materials storage cabinets, POL sheds, Hazardous Materials storage sheds, supply rooms, etc.

3. DEQ REPORTS:

a. Annual Toxic Use Reduction Hazardous Waste Reduction Progress Reports for all LQG must be completed annually NLT 1 September IAW OAR Chapter 340, Division 135, for the previous calendar year. This report is intended to track the use of toxic substances and the generation of hazardous wastes in the state. EPOCs will prepare this report retain the original on-site and provide a copy to AGI-ENV.

b. Annual Pounds Report for all Large Toxic Users. Any toxic substance used in quantities in excess of 10,000 pounds in a calendar year or any toxic substance used in quantities in excess of 1,000 pounds in a calendar year that constitutes ten percent or more by weight of the total toxic substances used in that calendar year. This report is due to DEQ NLT 1 September. Furnish a copy to AGI-ENV.

c. All generators listed in Chapter 5 paragraph 3 must submit annually the DEQ RVR report. LQG and SQG must include the Waste Generation and Management – Answer sheets. Reports are due to DEQ NLT 1 Mar of each year, reporting on HW activity for the previous calendar year. EPOCs will prepare this report and submit copies to DEQ with a copy furnished to AGI-ENV.

d. HW Determination Worksheet AGO Form 200-1-6. All generators of solid waste (liquid, sludge, solids, etc.) including State maintenance personnel must conduct a HW Determination in accordance with OAR 340-102-011. EPOCs will prepare this report and submit copies to AGI-ENV NLT 1 Mar of each year for the previous calendar year.

HAZARDOUS WASTE DETERMINATION WORKSHEET, HW INVENTORY, UW INVENTORY LOG

1 August 2001

1 Process Description	2 Hazardous Substance or PPE or LFN and RFG	3 Listed (F001-F005) or LFN	4 Characteristic or State only HWY (Y/N)	5 Reactivity (Y/N)	6 Knowledge or Analysis?	7 List all LUG and/or EPA Waste Codes	8 Monthly Generation Rate in Pounds (8)												9 Amount Stored On-Site
							JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
Absorbent Hazardous Substances (see MSDS)		N		Y	K														
Absorbent Non-Hazardous Substances	NONE	N	N	N	K	NR													
Adhesive (see MSDS)		N	Y	Y	K	D001 see inside													
Aerosol Can Residue (see Lab Analysis)		N	Y	Y	A	D001 see analysis													
Aerosol Cans (see MSDS)		N	Y	Y	K	D003 see inside													
ANTIFREEZE - Vehicle maintenance (See Lab Analysis)	Polychlorinated biphenyls	N	N	N	A	NR													
ASBESTOS - Brake shoes, millers, floor tiles, mats,	Asbestos	N	N	N	K	NR													
Batteries Alkaline AA, AAA, C, D, Spill change out	Potassium hydroxide Mercury Sulfuric Acid Sodium hydroxide Zinc	N	N	N (UW)	K	N/R													
Batteries Lead Acid, Automobile	Sulfuric Acid	N	Y	N (Y recycled, YH disposed)	K	D002													
Batteries Lithium-sulfur Dioxide change out	Lithium Sulfur Dioxide Sulfuric Acid	N	N	N (UW)	K	N/R													
Batteries Magnesium change out	Mercury Chromium Sulfuric Acid	N	N	N (UW)	K	N/R													
Batteries Mercury change out	Mercury Cadmium Sulfuric Acid Mercury	N	N	N (UW)	K	N/R													
Batteries Nickel-Cadmium change out	Potassium hydroxide Cadmium Mercury Nickel Sulfuric Acid Cadmium Sodium hydroxide	N	N	N (UW)	K	N/R													
Bulbs - Halogen, Incandescent, Fluorescent, Metal Halide, Sodium Mercury	Mercury Cadmium Sulfuric Acid	N	N	N (UW)	K	N/R													

5-12

AGO Form 200-16

(Sample form, see ORARNG Pam 200-1 Chapter 8 for a reproducible form)

HAZARDOUS WASTE DETERMINATION WORKSHEET INSTRUCTIONS

1. All generators of solid waste (liquid, sludge, solid, etc.) must conduct a HW determination IAW OAR 340-102-011 and ORARNGR 420-47 by 1 Mar of each year for the preceding calendar year. The HW determination worksheet is designed to help the generator comply with these requirements.

(a) Process description - Column 1

Describe the generation process, (e.g. painting, electroplating, etching, etc.) The generation process will determine if the waste is listed or not. Check 40 CFR 261.31, 261.32, and 261.33 for listings. Common listed wastes include spent solvents F001-F005, non-specific source 40 CFR 261.31. Compare your generating process to those listed. If the waste stream matches one of these sections, you generate a listed hazardous waste. Write down the EPA waste code found in 40 CFR 261.21-261.23 that identifies that waste stream in column #7.

To determine if your waste is listed, you may need to know the hazardous substance concentration, (e.g. 10% F listed solvents or sole active ingredient for the P and U lists).

(b) Hazardous Substances - Column 2

List all hazardous substances that are found in the waste stream and their concentration if known. A MSDS and/or analysis may be helpful in generating this list. 40 CFR 302.4 is a listing of all hazardous substances. **All hazardous wastes are included in that listing.**

(c) Listed Process - Column 3

Compare the process description and chemical components and their concentration with 40 CFR 261.31 to 261.33, the F, K, P lists.

Answer question #3: Is the waste stream listed? If the process is listed, record the appropriate waste code in column #7.

(d) Characteristics - Column 4**Does my waste possess a hazardous characteristic?**

Compare information on each waste stream that provides the flash point, pH, hazardous substances and their concentrations with the 40 CFR 261 Subpart C, Characteristics of HW, MSDS, vendors, manufacturers, trade associations, and corporate headquarters are sources of this information. Answer the following question: Does the waste meet characteristics of hazardous waste identified in 40 CFR 261, Subpart C? Remember a waste can be both a listed and a characteristic waste. If the waste is characteristic, record the appropriate waste code in column #7.

Is my waste a “State Only” hazardous waste?

If your waste is neither a listed nor a characteristic HW, it may still be a “State Only” HW if it meets the requirements of OAR 340-101-033, additional HW. “State Only” HW must be managed the same as RCRA regulated wastes. In summary: Oregon regulates all mixtures of P listed wastes with a 3% or greater concentration; all mixtures of U listed wastes with a 10% or greater concentration; and all pesticide residues that have an aquatic toxicity of 250 mg/l or less; certain nerve agents; and any waste designated as HW in another state must also be managed as a HW when transported into Oregon.

If your wastes meet any of the criteria for being “State Only” hazardous waste and is not a RCRA regulated waste, record the appropriate “State Only” waste code in column #7.

(e) Hazardous Waste? Yes or No. - Column 5

Now that you’ve completed columns 1 - 4, you know whether the waste is hazardous or not. Fill in column #5 with the appropriate answer to the question: Does this waste meet the criteria found in 40 CFR 261 and the State rules that define HW? If you are claiming an exemption

under 40 CFR 261, put down the citation being claimed. Remember to answer this question, even if the waste is non-hazardous.

(f) Knowledge or Analysis? - Column 6

How did you arrive at the answer in column #5? If knowledge of process was used, attach appropriate MSDS or other substantive documentation. If you used analysis to complete the determination, attach a copy of the analysis.

(g) List all DEQ and/or EPA Waste Codes - Column 7

Oregon law requires the listing of all applicable HW codes for each waste stream. If you determine that a waste stream is listed, then you must also determine if the waste stream is characteristic. However, if a waste is determined to be a federal HW, you do not have to determine if the waste is also a "State Only" HW. If you have followed the directions through columns #1-5, you have already listed all appropriate waste codes in column #7. Re-check your work. All applicable waste codes should be listed in this column.

For example: A generator used methyl ethyl ketone (MEK) to clean a paint gun used to spray lead based airplane paint. MEK by this use is a F005 listed hazardous waste. In addition the following characteristic waste codes apply: D001 (flash point of less than 140 degrees F.); D035 (MEK at 200 ppm); and D008 (for the lead content of the paint that contaminated the solvent 5.0 ppm).

(h) Monthly Generation Rate - Column 8

Enter the monthly generation rate of the waste stream. Be sure to include any satellite accumulation areas in your calculations. The monthly generation rate will influence your HW generator category. A CEG may generate 0-220 pounds, a SQG more than 220 but less than 2,200 pounds, and a LQG is defined as having generated 2,200 pounds or more per month.

(i) Amount Stored On-Site - Column 9

Calculate the total weight in pounds of all HW being stored on-site and record this number in column #9. The amount stored on site does not include wastes in an SAA, or wastes that are still in a process. Stored on-site does include wastes that are being accumulated in tanks or wastes that are being accumulated in a HWAA prior to disposal.

For example, you do not have to count any HW being stored in tanks as part of a wastewater treatment unit, elementary neutralization unit, or in a process unit (until the waste exits the process unit). The volume of HW being stored on-site may affect the generator's category. A CEG may never store more than 2,200 pounds of HW on-site at any time. If at any time more than 2,200 pounds is stored on-site, the generator's category is SQG. There is no storage limit on the amount of HW a LQG may have on-site.

(j) Generator Category – Row 10

Total the monthly generation of HW from all sources and compare this to the generator categories found on the form. Then total the amount of HW being stored on-site. If either of these equals or exceeds the limits found in the table provided on page 5-2 of this regulation, check your appropriate generator category at the bottom of the form.

REMEMBER:

Be sure to include this worksheet in with your HW records. It is documentation that you have completed a HW determination. You should retain this record for at least three years and preferably longer.

‘STATE ONLY’ HAZARDOUS WASTE CODES

Waste Codes Description

X001.....A pesticide residue or pesticide manufacturing residue that exhibits a 96-hour aquatic toxicity (LC50) equal to or less than 250 mg/l.

P999.....GB (sarin) and VX nerve agent

ORPXXX.....P listed State Only hazardous waste

ORUXXX.....U listed State Only hazardous wastes

P and U listed “State Only” hazardous wastes are designated ‘OR’ followed by the associated EPA waste codes. Substitute the appropriate P or U listed EPA waste code for the XXXs.

For example, a residue containing a 3 percent concentration of copper cyanide would be designated as ORP029 and a residue containing a 10 percent concentration of formaldehyde would be designated as ORU122.

4. STATE FIRE MARSHAL:

a. Hazardous Substance Information Survey fulfills the requirements of a Emergency Planning Community Right-to-Know (Tier II) Report. The primary objectives of EPCRA are to prepare local organizations to respond to accidental releases of hazardous substances and increase public awareness of the use of hazardous substances in local communities. SMWs will prepare this report annually and submit copies to the appropriate state agency with a copy furnished to AGI-ENV. The Oregon State Fire Marshal will establish reporting due dates. Report requirement is satisfied when the Oregon State Fire Marshal Hazardous Substance Survey is completed and submitted. For additional information see ORARNG Pam 200-1, Chapter 7 and Annex I.

REPORTS MATRIX

REPORT/FORM	PROPONENT	DUE DATE	REQUIRED BY
Hazardous Material Inventory	Dept of the Army	1 Feb for previous year	All ORARNG facilities
Hazardous Waste Determination Worksheet, UW Inventory, HW Inventory Log	Department of Environmental Quality & Dept of the Army	1 Mar for previous year	All ORARNG facilities
Exception Report within 45 days of initial transporter accepting HW	Environmental Protection Agency	Within 45 days of initial transporter accepting HW	Large Quantity Generators
Exception Report within 35 days of initial transporter accepting HW	Environmental Protection Agency	Within 35 days of initial transporter accepting HW	Small Quantity Generators
Toxic Use Reduction Hazardous Waste Reduction Progress Report	Department of Environmental Quality	Yearly by 1 Sep for previous CY. Retain original on-site.	Large Quantity Generators
Pounds Report	Department of Environmental Quality	Yearly by 1 Sep for previous CY. Mail to DEQ, copy furnish to AGI-ENV.	Large Toxic Users
Registration Verification Report -with- Waste Generation & Management Answer Sheets	Department of Environmental Quality	TBD-yearly	All facilities with a DEQ HW Generator ID # Small and Large Quantity Generators
State Fire Marshal Hazardous Substance Inventory	State Fire Marshal	TBD-yearly by SFM	All ORARNG facilities

FORM NUMBER REFERENCE MATRIX

FORM NUMBER	Name	Reference
AGO Form 200-1-1	Environmental POC Matrix	ORARNG Pam 200-1, Chapter 1
AGO Form 200-1-3	Hazardous Material Inventory	ORARNG Pam 200-1, Chapter 7 ORARNGR 420-47, Chapter 3
AGO Form 200-1-5	Above Ground Storage Tank Monthly Inspection	ORARNG Pam 200-1, Chapter 7
AGO Form 200-1-6	HW Determination Worksheet, HW Inventory, UW Inventory Log	ORARNG Pam 200-1, Chapter 8 ORARNGR 420-47, Chapter 5
AGO Form 200-1-7	Emergency Information	ORARNG Pam 200-1, Chapter 8
AGO Form 200-1-8	Weekly Inspection Sheet	ORARNG Pam 200-1, Chapter 8
AGO Form 200-1-9	Spill Incident Report	ORARNG Pam 200-1, Chapter 11
AGO Form 200-1-10	Spill Response Guide & OSC Responsibilities	ORARNG Pam 200-1, Chapter 11
AGO Form 200-1-13	Environmental Training Attendance Roster	ORARNG Pam 200-1, Chapter 19
AGO SRG1/SRG2	Spill Response Log Book Card	ORARNG Pam 200-1, Chapter 11
ASN-4 Sample Form	Asbestos Waste Shipment Report Form	ORARNGR 420-47, Chapter 6

5. SUGGESTED PROCEDURES FOR PARTICIPATING IN A REGULATORY AGENCY INSPECTION

- a. Follow the procedures outlined below during an inspection by any regulatory agency:
 - (1) Always keep records orderly and current in order to be prepared for any inspection. This pamphlet will help you do that.
 - (2) When an inspector arrives, treat the person with respect. However, request appropriate identification, since they will be civilians and not in uniform.
 - (3) Introduce yourself, then introduce the inspector to the unit or facility commander, your supervisor, and the Environmental POC.
 - (4) Accommodate the inspector immediately, despite your schedule.
 - (5) Record the inspector's name and the regulatory agency which they represent (obtain a calling card, if possible). Ask about the exact nature of the inspection.
 - (6) Explain that you are in charge of your operations, but environmental Subject Matter Experts are at AGI-ENV. If you so desire, suggest that the inspector delay the inspection until AGI-ENV personnel can be present, or continue with the inspection.
 - (7) Immediately call your higher headquarters and AGI-ENV. AGI-ENV will notify the Chief of Staff, concerned Directorates, and other affected personnel.
 - (8) Accompany the inspector during the inspection.
 - (9) Provide any requested documents or records, and discuss how your facility manages environmental responsibilities in the areas the inspector reviews.
 - (10) If you do not know the answer to a question, do not guess. If the question can be answered by AGI-ENV, provide the inspector with the name, address, and phone number of the appropriate contact person.
 - (11) To the best of your ability, demonstrate knowledge of environmental requirements. This knowledge should be supported with the Environmental Compliance Notebook, associated training documents, and required management plans.
 - (12) Discuss preliminary findings with the inspector to ensure you understand why current practices are not adequate. Differentiate between things that are "required" from those that are suggested as "better practices".
 - (13) Make notes during the visit to ensure that the inspection can be discussed in detail with AGI-ENV personnel, if they are not present.

(14) Ensure the inspector that the facility will immediately correct any management deficiencies, and will request assistance from the appropriate personnel if funding or other issues beyond the capability of the unit are involved.

(15) Sample checklists used by DEQ regulators are available at the end of this chapter.

b. See ORARNG Pam 200-1, Chapter 18 for additional guidance and documentation requirements.

LARGE QUANTITY HAZARDOUS WASTE GENERATOR CHECKLIST

Purpose and Explanation:

Hazardous waste generators are facilities that store or treat hazardous waste in tanks, containers, containment buildings, or drip pads and accumulate wastes for less than 90 days. Treatment in units other than tanks, containers, or containment buildings would require a hazardous waste treatment or disposal permit; storage for over 90 days would require a hazardous waste storage permit. The following is a general summary of requirements that could apply to a Large Quantity Hazardous Waste Generator (generate > 2,200 lbs./mo hazardous waste).

Oregon has adopted all federal hazardous waste regulations pursuant to OAR 340-100-002. In addition to the federal hazardous waste regulations (40 CFR 260-270), Oregon has state-only hazardous waste regulations (OAR Chapter 340, Divisions 100-120). The regulatory citations should be consulted for more specific information on individual requirements, as this summary is very generalized and not intended to encompass all aspects of the hazardous waste regulations.

In addition to hazardous waste regulations, this checklist also contains sections for Universal Waste (UW) and Used Oil Management. Although these wastes are not required to be managed as standard hazardous waste, their management is regulated by DEQ's hazardous waste program.

LARGE QUANTITY GENERATOR CHECKLIST

HAZARDOUS WASTE GENERATOR REQUIREMENT		REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
			YES	NO	N/A	
<i>RECORDKEEPING AND REPORTING REQUIREMENTS</i>						
EPA Identification Number		40 CFR 262.12(a) OAR 340-102-012				
Retain HW manifests (3 yrs)		40 CFR 262.40(a)				
Retain LDR notices (3 yrs)		40 CFR 268.7(a)(8)				
Retain waste determination data (3 yrs)		40 CFR 262.40(c) OAR 340-102-011(3)				
Annual Reporting	Universal Waste Inv.					
	Hazardous Material Inv.					
	EPOC/AEPOC Update					
	DEQ-RVR	OAR 340-102-041				
	SFM HazSub Inf. Survey	OAR 837				
Retain annual reports (3 yrs)		OAR 340-102-040(2)				
Hazardous waste generator fees		OAR 340-102-065				
<i>ACCUMULATION TIME LIMITS</i>						
On-site storage for < 90 days		40 CFR 262.34(a)				
<i>WASTE IDENTIFICATION REQUIREMENTS</i>						
Hazardous waste determination		OAR 340-102-011				
Determine all applicable waste code and underlying constituents on HW determination worksheet		40 CFR 268.9(a)				
LDR waste determination		40 CFR 268.7(a)				
<i>PERSONNEL TRAINING REQUIREMENTS</i>						
Written Personnel Training Program		40 CFR 262.34(a)(4) 40CFR 265.16(d)(3)				
Written job descriptions		40 CFR 262.34(a)(4) 40 CFR 265.16(d)(2)				
Documentation of employee training		40 CFR 262.34(a)(4) 40 CFR 265.16(d)(4)				
Annual training updates		40 CFR 262.34(a)(4) 40 CFR 265.16(c)				

HAZARDOUS WASTE GENERATOR REQUIREMENT	REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
		YES	NO	N/A	
<i>PREPAREDNESS AND PREVENTION/CONTINGENCY PLAN REQUIREMENTS</i>					
Internal comm/alarms available to personnel when involved in pouring, mixing, spreading or otherwise handling HW	40 CFR 262.34(a)(4) 40 CFR 265.32 (a) 40 CFR 265.34(a)				
External comm whenever only one employee is on the premises to summon external emergency assistance	40 CFR 262.34(a)(4) 40 CFR 265.32 (b)				
Emergency response equipment, fire extinguishers, fire control equipment, spill control, decontamination and water at adequate volume	40 CFR 262.34(a)(4) 40 CFR 265.32 (c)&(d)				
Equipment testing of all facility communication, alarm systems, fire protection, spill control and decontamination equipment	40 CFR 262.34(a)(4) 40 CFR 265.33				
Adequate aisle space	40 CFR 262.34(a)(4) 40 CFR 265.35				
Arrangements with Local Authorities as appropriate for type of waste handled	40 CFR 262.34(a)(4) 40 CFR 265.37				
Written Contingency Plan	40 CFR 262.34(a)(4) 40 CFR 265.51 (a)				
Description of emergency actions	40 CFR 262.34(a)(4) 40 CFR 265.52 (a)				
Emergency Coordinator list	40 CFR 262.34(a)(4) 40 CFR 265.52 (d)				
Emergency Coordinator on-call	40 CFR 262.34(a)(4) 40 CFR 265.55				
List and locations of emergency response equipment	40 CFR 262.34(a)(4) 40 CFR 265.52(e)				
Evacuation plan	40 CFR 262.34(a)(4) 40 CFR 265.52(f)				
Description of arrangements agreed to by Local Authorities	40 CFR 262.34(a)(4) 40 CFR 265.52(c)				
Contingency Plan submitted to Local Authorities	40 CFR 262.34(a)(4) 40 CFR 265.53(b)				
<i>SHIPPING REQUIREMENTS</i>					
Hazardous Waste Manifest	40 CFR 262.20				
Land Disposal Restrictions Notification	40 CFR 268.7				
Exception reporting	40 CFR 262.42(a)(2)				
<i>CONTAINER STORAGE REQUIREMENTS</i>					
Marked with Accumulation Start Date	40 CFR 262.34(a)(2)				
Marked with the words "Hazardous Waste"	40 CFR 262.34(a)(3)				

HAZARDOUS WASTE GENERATOR REQUIREMENT		REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
			YES	NO	N/A	
Containers in good condition		40 CFR 262.34(a)(1)(i) 40 CFR 265.171				
Containers closed		40 CFR 262.34(a)(1)(i) 40 CFR 265.173				
Weekly inspections		40 CFR 262.34(a)(1)(i) 40 CFR 265.174				
Ignitable HW stored > 50 feet from property line		40 CFR 262.34(a)(1)(i) 40 CFR 265.176				
Satellite Accumulation < 55 gallons		40 CFR 262.34(c)(1)				
S.A. Under control of operator		40 CFR 262.34(c)(1)				
S.A. Removal of waste exceeding 55 gallons within 3 days		40 CFR 262.34(c)(2)				
S.A. Marked with container contents		40 CFR 262.34(c)(1)(ii)				
S.A. Containers closed		40 CFR 262.34(c)(1)(i) 40 CFR 265.173				
USED OIL MANAGEMENT REQUIREMENTS						
Used Oil releases cleaned up		ORS 466.645				
Containers/tanks labeled "Used Oil"		40 CFR 279.22(c)(1)				
Containers/tanks in good condition		40 CFR 279.22(b)				
Containers closed or under cover		OAR 340-111-032(2)				
Used Oil either self-transported or transported by a registered transporter		40 CFR 279.24				
UNIVERSAL HAZARDOUS WASTE REQUIREMENTS						
Containers labeled with contents		40 CFR 273.14 40 CFR 273.34 OAR 340-113-030(6)(a)				
UW Handler status	SQH <11,000 lbs	40 CFR 273.6				
	LQH > 11,000 lbs	40 CFR 273.6				
Storage time limitations	SQH <1 yr	40 CFR 273.15(b)				
	LQH >1yr	40 CFR 273.35(b)				
Inventory/dating system to demonstrate compliance with storage time limitations		40 CFR 273.15(c) 40 CFR 273.35(c)				
Shipment to UW handler or TSD		40 CFR 273.18 40 CFR 273.38				
Shipping documentation (Large Quantity Handlers (>11,000 lbs)only)		40 CFR 273.39(b)				
Retain shipping documentation (3 yrs)		40 CFR 273.39(c)				

SMALL QUANTITY HAZARDOUS WASTE GENERATOR CHECKLIST

HAZARDOUS WASTE GENERATOR REQUIREMENT		REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
			YES	NO	N/A	
<i>RECORDKEEPING AND REPORTING REQUIREMENTS</i>						
EPA Identification Number		40 CFR 262.12(a) OAR 340-102-012				
Retain HW manifests (3 yrs)		40 CFR 262.40(a)				
Retain LDR notices (3 yrs)		40 CFR 268.7(a)(8)				
Retain waste determination data (3 yrs)		40 CFR 262.40(c) OAR 340-102-011(3)				
Annual Reporting	Universal Waste Inv.					
	Hazardous Material Inv.					
	EPOC/AEPOC Update					
	DEQ-RVR	OAR 340-102-041				
	SFM HazSub Inf. Survey	OAR 837				
Retain annual reports (3 yrs)		OAR 340-102- 040(2)				
Hazardous waste generator fees		OAR 340-102-065				
<i>ACCUMULATION TIME LIMITS</i>						
On-site storage for < 180 days		40 CFR 262.34(a)				
On-site storage <270 days (if transporting >200 miles)		40 CFR 262.34(e)				
Storage of less than 13,200 lbs		40 CFR 268.9				
<i>WASTE IDENTIFICATION REQUIREMENTS</i>						
Hazardous waste determination		OAR 340-102-011				
Determine all applicable waste code and underlying constituents on HW determination worksheet		40 CFR 268.9(a)				
LDR waste determination		40 CFR 268.7(a)				
<i>PERSONNEL TRAINING REQUIREMENTS</i>						
Ensure employee awareness of waste handling/emergency procedures		40 CFR 262.34(d)(5)(iii)				

HAZARDOUS WASTE GENERATOR REQUIREMENT	REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
		YES	NO	N/A	
<i>EMERGENCY MANAGEMENT REQUIREMENTS</i>					
Internal communications/alarms available to personnel when involved in pouring, mixing, spreading or otherwise handling HW	40 CFR 262.34(d)(4) 40 CFR 265.32 (a)				
External communications whenever only one employee is on the premises to summon external emergency assistance	40 CFR 262.34(d)(4) 40 CFR 265.32 (b)				
Emergency response equipment, fire extinguishers, fire control equipment, spill control, decontamination and water at adequate volume	40 CFR 262.34(d)(4) 40 CFR 265.32(c), (d)				
Equipment testing of all facility communication, alarm systems, fire protection, spill control and decontamination equipment	40 CFR 262.34(d)(4) 40 CFR 265.33				
Adequate aisle space	40 CFR 262.34(d)(4) 40 CFR 265.35				
Arrangements with Local Authorities as appropriate for type of waste handled	40 CFR 262.34(d)(4) 40 CFR 265.37				
Designated emergency coordinator, on-site or on-call	40 CFR 262.34(d)(5)(i)				
Information posted next to telephone: A. Name and telephone number of emergency coordinator B. Location of fire extinguishers, spill equipment, alarms. C. Fire department phone number	40 CFR 262.34(d)(5)(ii)				
<i>SHIPPING REQUIREMENTS</i>					
Hazardous Waste Manifest	40 CFR 262.20				
Land Disposal Restrictions Notification	40 CFR 268.7				
Illegal Disposal	ORS 466.100(1)				
Exception reporting	40 CFR 262.42(a)				
<i>CONTAINER STORAGE REQUIREMENTS</i>					
Marked with Accumulation Start Date	40 CFR 262.34(d)(4) 40 CFR 262.34(a)(2)				
Marked with the words "Hazardous Waste"	40 CFR 262.34(d)(4) 40 CFR 262.34(a)(3)				
Containers in good condition	40 CFR 262.34(d)(2) 40 CFR 265.171				
Containers closed	40 CFR 262.34(d)(2) 40 CFR 265.173				

HAZARDOUS WASTE GENERATOR REQUIREMENT		REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
			YES	NO	N/A	
Weekly inspections		40 CFR 262.34(d)(2) 40 CFR 265.174				
Satellite Accumulation < 55 gallons		40 CFR 262.34(c)(1)				
S.A. At or near Point of Generation		40 CFR 262.34(c)(1)				
S.A. Under control of operator		40 CFR 262.34(c)(1)				
S.A. Removal of waste exceeding 55 gallons within 3 days		40 CFR 262.34(c)(2)				
S.A. Marked with container contents		40 CFR 262.34(c)(1)(ii)				
S.A. Containers closed		40 CFR 262.34(c)(1)(i) 40 CFR 265.173				
USED OIL MANAGEMENT REQUIREMENTS						
Used Oil releases cleaned up		ORS 466.645				
Containers/tanks labeled "Used Oil"		40 CFR 279.22(c)(1)				
Containers/tanks in good condition		40 CFR 279.22(b)				
Containers closed or under cover		OAR 340-111-032(2)				
Used Oil either self-transported or transported by a registered transporter		40 CFR 279.24				
UNIVERSAL HAZARDOUS WASTE REQUIREMENTS						
Containers labeled with contents		40 CFR 273.14 40 CFR 273.34 OAR 340-113-030(6)(a)				
UW Handler status	SQH <11,000 lbs	40 CFR 273.6				
	LQH > 11,000 lbs	40 CFR 273.6				
Storage time limitations	SQH <1 yr	40 CFR 273.15(b)				
	LQH >1yr	40 CFR 273.35(b)				
Inventory/dating system to demonstrate compliance with storage time limitations		40 CFR 273.15(c) 40 CFR 273.35(c)				
Shipment to UW handler or TSD		40 CFR 273.18 40 CFR 273.38				
Shipping documentation (Large Quantity Handlers (>11,000 lbs)only)		40 CFR 273.39(b)				
Retain shipping documentation (3 yrs)		40 CFR 273.39(c)				

CONDITIONALLY EXEMPT HAZARDOUS WASTE GENERATOR CHECKLIST

HAZARDOUS WASTE GENERATOR REQUIREMENT		REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
			YES	NO	N/A	
<i>RECORDKEEPING AND REPORTING REQUIREMENTS</i>						
EPA Identification Number		40 CFR 262.12(a) OAR 340-102-012				
Retain HW manifests (3 yrs)		40 CFR 262.40(a)				
Retain waste determination data (3 yrs)		40 CFR 262.40(c) OAR 340-102-011(3)				
Annual Reporting	Universal Waste Inv.					
	Hazardous Material Inv.					
	EPOC/AEPOC Update					
	DEQ-RVR	OAR 340-102-041				
	SFM HazSub Inf. Survey	OAR 837				
Retain annual reports (3 yrs)		OAR 340-102-040(2)				
<i>ACCUMULATION TIME LIMITS</i>						
Storage of less than 2,200 lbs		40 CFR 262.34				
<i>WASTE IDENTIFICATION REQUIREMENTS</i>						
Hazardous waste determination		OAR 340-102-011				
Determine all applicable waste code and underlying constituents on HW determination worksheet		40 CFR 268.9(a)				
<i>PERSONNEL TRAINING REQUIREMENTS</i>						
Ensure employee awareness of waste handling/emergency procedures		ORARNGR 200-1				
<i>EMERGENCY MANAGEMENT REQUIREMENTS</i>						
Designated emergency coordinator, on-site or on-call		ORARNGR 200-1				
Information posted next to telephone: A. Name and telephone number of emergency coordinator B. Location of fire extinguishers, spill equipment, alarms. C. Fire department phone number		ORARNGR 200-1				

HAZARDOUS WASTE GENERATOR REQUIREMENT		REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
			YES	NO	N/A	
SHIPPING REQUIREMENTS						
Hazardous Waste Manifest OMS		ORARNGR 420-47				
DA Form 2765-1 Armories		ORARNGR 420-47				
CONTAINER STORAGE REQUIREMENTS						
Marked with Accumulation Start Date		ORARNGR 420-47				
Marked with the words "Hazardous Waste"		ORARNGR 420-47				
Containers in good condition		ORARNGR 420-47				
Containers closed		ORARNGR 420-47				
Weekly inspections		ORARNGR 420-47				
USED OIL MANAGEMENT REQUIREMENTS						
Used Oil releases cleaned up		ORS 466.645				
Containers/tanks labeled "Used Oil"		40 CFR 279.22(c)(1)				
Containers/tanks in good condition		40 CFR 279.22(b)				
Containers closed or under cover		OAR 340-111-032(2)				
Used Oil either self-transported or transported by a registered transporter		40 CFR 279.24				
UNIVERSAL HAZARDOUS WASTE REQUIREMENTS						
Containers labeled with contents		40 CFR 273.14 40 CFR 273.34 OAR 340-113-030(6)(a)				
UW Handler status	SQH <11,000 lbs	40 CFR 273.6				
	LQH > 11,000 lbs	40 CFR 273.6				
Storage time limitations	SQH <1 yr	40 CFR 273.15(b)				
	LQH >1yr	40 CFR 273.35(b)				
Inventory/dating system to demonstrate compliance with storage time limitations		40 CFR 273.15(c) 40 CFR 273.35(c)				
Shipment to UW handler or TSD		40 CFR 273.18 40 CFR 273.38				
Shipping documentation (Large Quantity Handlers (>11,000 lbs)only)		40 CFR 273.39(b)				
Retain shipping documentation (3 yrs)		40 CFR 273.39(c)				