

Reclamation Manual

Directives and Standards

Checklist 1

HAZARDOUS WASTE INSPECTION CHECKLIST

Site/Facility: _____

Date: _____

Address: _____

EPA I.D.: _____

Generator Status:

Using the following criteria determine the correct generator category for the facility.

_____ Conditional Exempt Small Quantity Generator (CESQG) One who generates < 220 lbs. hazardous waste or < 2.2 lbs. acutely hazardous waste generated in a calendar month; or, accumulates onsite < 2,200 lbs. hazardous waste or < 2.2 lbs. acutely hazardous waste.

_____ Small Quantity Generator (SQG) One who generates _____ 220 lbs. and < 2,200 lbs. hazardous waste; or, accumulates onsite < 13,200 lbs. hazardous waste or < 2.2 lbs. acutely hazardous waste.

_____ Large Quantity Generator (LQG) One who generates _____ 2,200 lbs. acutely hazardous waste or _____ 2.2 lbs. acutely hazardous waste in a calendar month; or accumulate onsite > 13,200 lbs. hazardous waste or _____ 2.2 lbs. acutely hazardous waste.

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Waste Stream Characterization

The following is an example format to identify and document facility waste streams. For generators other than CESQG, it is required that a hazardous waste stream characterization has been made and documented for all applicable waste streams.

Waste Stream Description: _____
Quantity Generated per Calendar Month _____ Quantity Accumulated Onsite _____
Generator has made a hazardous waste determination. Yes: ____ No: ____

Waste Stream Description: _____
Quantity Generated per Calendar Month _____ Quantity Accumulated Onsite _____
Generator has made a hazardous waste determination. Yes: ____ No: ____

Waste Stream Description: _____
Quantity Generated per Calendar Month _____ Quantity Accumulated Onsite _____
Generator has made a hazardous waste determination. Yes: ____ No: ____

Waste Stream Description: _____
Quantity Generated per Calendar Month _____ Quantity Accumulated Onsite _____
Generator has made a hazardous waste determination. Yes: ____ No: ____

Waste Stream Description: _____
Quantity Generated per Calendar Month _____ Quantity Accumulated Onsite _____
Generator has made a hazardous waste determination. Yes: ____ No: ____

Waste Stream Description: _____
Quantity Generated per Calendar Month _____ Quantity Accumulated Onsite _____
Generator has made a hazardous waste determination. Yes: ____ No: ____

Waste Stream Description: _____
Quantity Generated per Calendar Month _____ Quantity Accumulated Onsite _____
Generator has made a hazardous waste determination. Yes: ____ No: ____

Waste Stream Description: _____
Quantity Generated per Calendar Month _____ Quantity Accumulated Onsite _____
Generator has made a hazardous waste determination. Yes: ____ No: ____

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INSPECTION ITEM	CITE	YES	NO	COMMENTS
Facility has an EPA ID No?	4040 CFR 262.12			
Has the facility made a hazardous waste determination for each waste stream?	4040 CFR 262.11			
1) Does the facility have any materials which are accumulated, stored, or treated in lieu of being disposed of? 2) Have these materials been included when determining the facility's generator status?	4040 CFR 261.2(b) (3)	1) 2)		
Are waste analysis records available for wastes shipped offsite within the last 3 years?	4040 CFR 262.40(a)			
Are signed (returned copy) manifests (or invoices**) available for all waste shipped offsite within the last 3 yrs?	4040 CFR 262.20 262.40 262.20(e)			
Are Land Ban notifications and certification included with the manifests (must be kept for 5 yrs)?	40 CFR 268.7(3)(i)			
If the facility is a LQG are copies of the Biennial Report for the last 3 years available?	40 CFR 262.40(b)			
If the facility is a LQG is a written Contingency Plan available?	40 CFR 262.34(A) (reference 265.50- 56)			
If the facility is a LQG, are written 1) training plans; 2) job title, description, and identification of personnel involved with hazardous waste management; and 3) training records available for the past 3 years?	40 CFR 262.34(a) (reference 265.16)	1) 2) 3)		

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INSPECTION ITEM	CITE	YES	NO	COMMENTS
If the facility is a SQG have all employees been trained with proper waste handling and emergency procedures?	40 CFR 262.34(d) (5)			
If the facility is a SQG, is the following information posted next to the telephone (where wastes are managed): 1) Name and telephone no. of the emergency coordinator; 2) Location of fire extinguishers and spill control equipment; 3) Telephone # of the Fire Department	40 CFR 262.34(d) (5)	1) 2) 3)		
Is there a means of communication (telephone, intercom, and 2-way radio) provided at the scene of operations?	40 CFR 262.34(5) (i) (reference 265.32(b))			
Have arrangements been made with local authorities (hospitals, police and fire departments) to familiarize the authorities with the facility?	40 CFR 262.34(a) & (d) (reference 265.37(a))			
1) Have any of the State or local authorities contacted declined to enter into such arrangements? 2) If so, are records available indicating such refusal?	40 CFR 265.37(b)	1) 2)		
1) Are regularly scheduled weekly inspections performed on containers and tanks in temporary storage area? 2) Are inspection records available(LQG)?	40 CFR 262.34(a) (reference 265.174 and 265.195)	1) 2)		
Are containers located in the temporary storage area labeled with the date of accumulation and the words "Hazardous Waste"?	40 CFR 262.34(a) (3)			

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INSPECTION ITEM	CITE	YES	NO	COMMENTS
Is adequate aisle space available for inspection and emergency response equipment?	40 CFR 262.34(a) (reference 265.35)			
Are containers holding hazardous waste in good condition?	40 CFR 262.34(a) (reference 265.171)			
Are the containers compatible with the waste contained therein?	40 CFR 262.34(a) (reference 265.172)			
Are containers closed except when adding or removing waste?	40 CFR 262.34(a) (reference 265.173)			
Is secondary containment provided for containers and tanks at satellite accumulation area and temporary storage area?	40 CFR 265.193 May also be required under CWA.			
Are wastes shipped offsite within 90 days (LQG); or, 180 days or 270 days if facility is > 200 miles from TSD (SQG).	40 CFR 262.34(b) & (c)			
Before transporting, are hazardous wastes packaged, labeled, and marked in accordance with applicable DOT regulations?	40 CFR 262.30-32			
Does the transporter of the facility's hazardous waste have an EPA ID No.?	40 CFR 263.11			

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INSPECTION ITEM	CITE	YES	NO	COMMENTS
Does the transporter have a minimum level of financial insurance (\$1,000,000 to \$5,000,000)?	40 CFR 263.10 (reference 40 CFR Subt B, Ch. III, Subch. B, Pt 387, Refs & Annos).			
1)Has the facility performed an onsite or telephone audit of the treatment, storage or disposal (TSD) facility? 2)Are audit records available?	Reclamation Directive	1) 2)		
Does the TSD facility have liability insurance and closure/post closure assurance?	Reclamation Directive			
Did the facility contact EPA or the State to determine if the TSD had any outstanding violations?	Reclamation Directive			
Lead-Acid Batteries				
Does the facility recycle spent lead-acid batteries?	40 CFR 266.80			
Are the spent batteries delivered to the retailer, or a recycling center? If delivered to a recycling center, has this center been audited for environmental compliance?	40 CFR 266.80			
	Reclamation Directive			
Used Oil				
Are used oils collected for recycling?	40 CFR 279.10(a)			
1) Has any listed hazardous waste been added to the used oil? 2) If so, was the used oil managed as a hazardous waste?	40 CFR 279.10(b) 261 Subpart C	1) 2)		

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INSPECTION ITEM	CITE	YES	NO	COMMENTS
1) Has any characteristic (other than flammable characteristic) hazardous waste been added to the used oil? 2) Did the resulting mixture exhibit any of the characteristics as described in 261 sub part C?	40 CFR 279.10(b)	1) 2)		
Are the accumulation containers and tanks labeled with the words "Used Oil"?	40 CFR 279.22(c)			
Are the accumulation containers and tanks closed except when adding or removing the used oil?	40 CFR 265.173			
1) Are used oils burned onsite for energy recovery in a space heater? 2) Are any of these used oils received from offsite?	40 CFR 279.23	1) 2)		
Is analysis available to determine if used oils are specification used oils?	40 CFR 279.20(b) (3)			
Are used oils used for dust suppression or weed control?	40 CFR 279 subpart I			
If used oils are shipped offsite for reclamation or re-refinement, is a tolling arrangement in place indicating 1). The type of used oil and frequency of shipments, 2) .that the vehicle used is owned by the oil processor/re-refiner, and 3) .the reclaimed oil is returned to the generator?	40 CFR 279.24	1) 2) 3)		
Does a transporter ship used oil to a transporter/transfer facility?	40 CFR 279.43			

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INSPECTION ITEM	CITE	YES	NO	COMMENTS
1.) Has this facility been audited within the last year? 2) Does this facility have liability insurance? 3) Does the facility have closure/post-closure assurance? 4) Does the facility have a current SPCC plan?	Reclamation Directive 40 CFR 112.3	1) 2) 3) 4)		
Used Antifreeze				
Does the facility generate used antifreeze? If so, is the used antifreeze recycled? Note: most states regulate used antifreeze as a hazardous waste.	BMP			
Is used antifreeze mixed with used oils?	40 CFR 279.10			
1) If used antifreeze is disposed, has a hazardous waste determination been performed? 2) Are waste analysis records available?	40 CFR 262.11 262.40(c)	1) 2)		

Comments: _____

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Site / Satellite Accumulation Point location: _____

(Use a separate Satellite Generator Checklist for each satellite accumulation point evaluated)

Satellite Accumulation Checklist

Inspection Item	Cite	Yes	No	Comments
Are containers holding hazardous waste in good condition?	40 CFR 262.34(a) (reference 265.171)			
Are the containers compatible with the waste contained therein?	40 CFR 262.34(a) (reference 265.172)			
Are containers closed except when adding or removing waste?	40 CFR 262.34(a) (reference 265.173)			
Are satellite accumulation containers labeled with the words "Hazardous Waste" or words identifying the contents of the container?	40 CFR 262.34(c)			
Is more than 55 gallons of EPA code "Toxic"(T) hazardous waste or more than one quart of EPA code "Hazardous" (H) hazardous waste located at the satellite accumulation area?	40 CFR 262.34(c) (1)			
Is secondary containment provided for containers and tanks at satellite accumulation area and temporary storage area?	40 CFR 265.193			

Comments: _____

