CHECKLIST ROADMAP

Use this table to make sure you have included all required checklists. Unused checklists can be discarded or struck-through.

CHECKLIST	APPLICABILITY	INCLUDED?
APPENDIX 1-1. DRIVE-BY	All	
APPENDIX 1-2. SITE ENTRY AND INBRIEFING	All	
APPENDIX 1-3. FACILITY BACKGROUND	All	
APPENDIX 1-4. GENERATOR WASTE STREAMS	All	
APPENDIX 1-5. OFF-SITE WASTE STREAMS	TSDFs	
APPENDIX 1-6. RECORDS REVIEW		
A. VERY SMALL QUANTITY GENERATOR (VSQG) REQUIREMENTS	VSQG	
B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS	SQG	
C. LARGE QUANTITY GENERATOR (LQG) REQUIREMENTS	LQG	
D. TREATMENT, STORAGE, AND DISPOSAL FACILITY (TSDF) REQUIREMENTS	TSDF	
APPENDIX 1-7. VISUAL REVIEW		
A. SATELLITE ACCUMULATION AREA(S)	SQG, LQG, TSDF (SAA)	
B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS		
1. Required Response Equipment and Hazard Management	SQG (all)	
2. Container Accumulation Area	SQG (Containers)	
3. Tank Accumulation Area(s)	SQG (Tanks)	
C. LARGE QUANTITY GENERATOR (LQG) REQUIREMENTS		
1. Required Response Equipment	LQG (all)	
2. Container Accumulation Area	LQG (Containers)	
3. Tank Accumulation Area(s)	LQG (Tanks)	
D. TREATMENT, STORAGE, AND DISPOSAL FACILITY (TSDF) REQUIREMENTS		
1. Required Response Equipment	TSDF (all)	
2. Container Accumulation Area	TSDF (Containers)	
3. Tank Accumulation Area(s)	TSDF (Tanks)	
E. USED OIL		
1. Prohibitions	Used Oil (all)	
2. Standards for Used Oil Generators and Used Oil Collection/Aggregation Points	Used Oil Generators, Used Oil Collection/Aggregation	
3. Standards for Used Oil Collection/Aggregation Points	Used Oil Collection/Aggregation	
F. UNIVERSAL WASTE (UW)		
1. General	SQH	
2. Universal Waste Lamps	SQH (lamps)	
3. Universal Waste Batteries	SQH (batteries)	
4. Universal Waste Mercury-Containing Equipment (MCE)	SQH (MCE)	
5. Universal Waste Pesticides	SQH (pesticides)	
APPENDIX 1-8. EXIT BRIEFING	All	

APPENDIX 1-1. DRIVE-BY

Facility: _____ Date: _____ Arrival time: _____

1. Drive-by conducted from public right-of-way? ☐Yes ☐No

2. Determine the direction "North" with respect to the facility, and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):

3. Obvious concerns visible from public right-of-way (photos)? ☐Yes ☐No

☐Containers ☐Tanks ☐Processing Equipment ☐Loading Areas
☐Unloading Areas ☐Security Devices ☐Open Drums ☐Stressed Vegetation
☐Unusual Staining ☐Unusual Odors ☐Obvious Discharges ☐Improper Disposal
☐Safety Concerns ☐Other Concerns

APPENDIX 1-2. SITE ENTRY AND INBRIEFING

1. ☐Used main entrance ☐Entered during normal operating hours ☐No excessive delays (>15 min)

2. Facility Representative(s):

Name	Title	Years in position

3. Does representative have intimate knowledge of all waste management practices? ☐Yes ☐No

4. Introduction:
☐Presented credentials
☐Explained responsibility to provide accurate information and provided Section 1001 and 1002 U.S.C. to facility
☐Verified presence at correct facility (checked address/I.D. #)
☐Explained authority to conduct inspection (Section 3007 of RCRA)
☐Explained purpose, scope, and order of the inspection; completed Multimedia Screening Checklist
☐Explained documentation process—worksheets, checklists, photos, notes, statements
☐Explained facility's right to claim CBI

5. Was full access granted? ☐By facility representative ☐By other (name): _____
☐No - Access denied. Name of person denying access: _____
Time of denial: _____

Reason for denial, or limitations placed on access: _____

_____

APPENDIX 1-3. FACILITY BACKGROUND

1. Site History:

Date facility began operating: _____ Number of employees: _____

Number of shifts/hour worked: _____ Number of days worked per week: _____

Size (sq. ft., how divided): _____

Property owner and facility operator the same? ☐Yes ☐No

2. Major products or services provided: _____

3. Major raw materials used: _____

4. Major manufacturing or processing operations which generate waste streams (provide brief description, then complete **APPENDIX 1-4** for each):

Operation/Process	**Waste Stream(s)**

5. Verified/compared above information with facility Notification Form: ☐Yes ☐No

Describe updates to the Verification Report:

6. Hazardous Waste Generator Status: (based on records review)

☐Non-generator

☐VSQG (0-100 kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1 kg acute waste or 100 kg of acute spill residue)

☐SQG (100-1000 kg/mo and accumulate <6000 kg)

☐LQG (>1000 kg/mo or >1 kg/mo of acute waste)

Is facility's status solidly within above category? ☐Yes ☐No (describe)

7. TSDF Status: ☐Treatment ☐Storage ☐Disposal ☐Not applicable

Note: If TSDF, types of units, number of units, capacities, processes, etc.:

8. Resolved questions from Pre-Inspection Worksheet or Compliance Officer? ☐Yes ☐No ☐No Questions

9. Requested site map or diagram to identify all observations? ☐Yes ☐None Available

APPENDIX 1-4. GENERATOR WASTE STREAMS

___. WASTE STREAM: ______________________________

FACILITY DETERMINATION: ☐Hazardous ☐Nonhazardous ☐Other ☐Not done ☐Inadequate

WASTE CODES: ______________________________

DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing

DOCUMENTATION: ______________________________

GENERATING PROCESS: ______________________________

GENERATION RATE: ______________________________

ON-SITE MANAGEMENT: ☐In SAAs ☐Visually inspected? ☐In storage/Accumulation ☐Visually inspected?

____

____

OFF-SITE MANAGEMENT/DISPOSITION: ______________________________

____

___. WASTE STREAM: ______________________________

FACILITY DETERMINATION: ☐Hazardous ☐Nonhazardous ☐Other ☐Not done ☐Inadequate

WASTE CODES: ______________________________

DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing

DOCUMENTATION: ______________________________

GENERATING PROCESS: ______________________________

GENERATION RATE: ______________________________

ON-SITE MANAGEMENT: ☐In SAAs ☐Visually inspected? ☐In storage/Accumulation ☐Visually inspected?

____

____

OFF-SITE MANAGEMENT/DISPOSITION: ______________________________

____

___. WASTE STREAM: ______________________________

FACILITY DETERMINATION: ☐Hazardous ☐Nonhazardous ☐Other ☐Not done ☐Inadequate

WASTE CODES: ______________________________

DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing

DOCUMENTATION: ______________________________

GENERATING PROCESS: ______________________________

GENERATION RATE: ______________________________

ON-SITE MANAGEMENT: ☐In SAAs ☐Visually inspected? ☐In storage/Accumulation ☐Visually inspected?

____

____

OFF-SITE MANAGEMENT/DISPOSITION: ______________________________

____

___. **WASTE STREAM:** ____

FACILITY DETERMINATION: ☐Hazardous ☐Nonhazardous ☐Other ☐Not done ☐Inadequate

WASTE CODES: ____

DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing

DOCUMENTATION: ____

GENERATING PROCESS: ____

GENERATION RATE: ____

ON-SITE MANAGEMENT: ☐In SAAs ☐Visually inspected? ☐In storage/Accumulation ☐Visually inspected?

____

____

OFF-SITE MANAGEMENT/DISPOSITION: ____

____

___. **WASTE STREAM:** ____

FACILITY DETERMINATION: ☐Hazardous ☐Nonhazardous ☐Other ☐Not done ☐Inadequate

WASTE CODES: ____

DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing

DOCUMENTATION: ____

GENERATING PROCESS: ____

GENERATION RATE: ____

ON-SITE MANAGEMENT: ☐In SAAs ☐Visually inspected? ☐In storage/Accumulation ☐Visually inspected?

____

____

OFF-SITE MANAGEMENT/DISPOSITION: ____

____

___. **WASTE STREAM:** ____

FACILITY DETERMINATION: ☐Hazardous ☐Nonhazardous ☐Other ☐Not done ☐Inadequate

WASTE CODES: ____

DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing

DOCUMENTATION: ____

GENERATING PROCESS: ____

GENERATION RATE: ____

ON-SITE MANAGEMENT: ☐In SAAs ☐Visually inspected? ☐In storage/Accumulation ☐Visually inspected?

____

____

OFF-SITE MANAGEMENT/DISPOSITION: ____

____

APPENDIX 1-6. RECORDS REVIEW

C. LARGE QUANTITY GENERATOR (LQG) REQUIREMENTS

C.1. Manifests

#	√/X/NA	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
1.		Uses manifest system-**262.20(a)(1)**	
2.		Maintains manifests for 3 years-**262.40(a)**	
3.		Has EPA I.D. number-**262.20(a)**	
4.		Has generator name, address, phone number on manifest-**262.20(a)**	
5.		Has transporter(s) name & EPA I.D. number on manifest-**262.20(a)**	
6.		Has designated facility name, address & EPA I.D. number on manifest-**262.20(a)**	
7.		Designates alternate facility on manifest (optional)-**262.20(c)**	
8.		Has unique pre-printed manifest tracking number and number of pages on manifest-**262.20(a)**	
9.		Has DOT shipping name, hazard class, waste code, and reportable quantity (RQ) (if required by 49 CFR 172) on manifest-**262.20(a)**	
10.		Has number, type, quantity, unit wt/vol. of containers on manifest-**262.20(a)**	
11.		Has proper certification including waste minimization on manifest-**262.20(a)**	
12.		Signs and dates manifest and has transporter sign and date manifest-**262.23(a)**	
13.		Submits exception report if necessary-**262.42**	
14.		Sends LDR notification/certification with manifests on first shipment-**262.17(a)(9)→268.7(a)(2)**	
15.		Includes manifest number, correct EPA waste codes & treatment standards, and waste analysis data on LDR notification/certification-**262.17(a)(9)→268.7(a)(2)**	
16.		Maintains LDR notification/certification/waste analysis data and other documents for 3 years-**262.17(a)(9)→268.7(a)(8)**	

√ - in compliance X – not in compliance NA – not applicable

17. Approximate number of manifests generated since last inspection, or over past 3 years: _____

21. Approximate number of manifests reviewed: _____

22. Copies of manifests made? ☐ YES ☐ NO

C.2. Waste Analysis/Waste Determination and Land Disposal Restrictions

1. Location of waste analysis/waste determination records: _____

2. Person responsible for waste analysis/waste determination: _____

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
3.		Does not dilute waste impermissibly to meet LDR standards-**268.3(a) & (b)**	
4.		Determines if waste is a hazardous waste at the point of generation before any dilution, mixing, or other alteration of the waste occurs, and at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors-**262.11(a)**	
5.		Determines whether a waste meets any of the listings in 40 CFR 261 Subpart D-**262.11(c)**	
6.		Determines whether a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C-**262.11(d)**	
7.		Identifies all applicable EPA hazardous waste numbers-**262.11(g)**	
8.		Maintains records supporting hazardous waste determinations for at least 3 years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal-**262.11(f)**	
9.		Documents waste determination, including results of any tests, sampling, waste analyses, or other determinations; documentation of tests, sampling, and analytical methods; descriptions or processes, waste composition, and waste properties; and records which explain the knowledge basis-**262.11(f)**	
10.		Determines waste does <u>not</u> meet applicable treatment standards (ATS)-**268.7(a)(2)**	
11.		Submits a one-time written notice to TSDF with initial shipment and a copy placed in file-**268.7(a)(2)**	
12.		Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition-**268.5 & 6** (Describe the variance, extension, or petition that applies)	
13.		If waste is shipped off site for disposal, provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs-**268.7(a)(4)**	
14.		If waste is shipped off site for disposal, provides a notice with initial shipment, or new notification, if changes occur-**268.7(a)(2)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
15.		If waste is shipped off site for disposal, includes on the LDR notice: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable-**268.7(a)(2)→268.7(a)(4)**	
16.		If waste is determined waste to be excluded from the definition of hazardous or solid waste, retains a one-time notice describing generation, subsequent exclusion or exemption, and disposition of the waste, in the facility's on-site files-**268.7(a)(7)**	
17.		If generator determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment, submits a one-time written notice to TSDF with initial shipment and a copy placed in file-**268.7(a)(3)(i)**	
18.		If waste is not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i)-**268.9(a)**	
19.		If waste is land disposed, determines if waste meets the treatment standards specified in 268 Subpart D-**268.9(c)**	
20.		If claiming that their characteristic waste is no longer hazardous, sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes in process, operation, or receiving facility-**268.9(d)**	

√ - in compliance X – not in compliance NA – not applicable

If hazardous waste prohibited from land disposal is any of the following: a contaminated soil, or a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge – Complete additional LDR checklists in **APPENDIX 2-1**

21. Notes/Observations: _____

C.3. Preparedness and Prevention

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Designates an emergency coordinator who is on premises or on call-**262.17(a)(6)→262.264**	
2.		Ensures emergency coordinator thoroughly familiar with all aspects of the generator's operations-**262.17(a)(6)→262.264**	
3.		Makes arrangements with local emergency agencies-**262.17(a)(6)→262.256(a)**	
4.		Familiarizes emergency agencies with the layout of the facility, properties of hazardous waste handled at the facility, normal work locations, entrances and roads inside the facility, possible evacuation routes, and typical injuries or illnesses which could result from an incident-**262.17(a)(6)→262.256(a)(2)**	
5.		If more than one police or fire department might respond, designates a primary response entity-**262.17(a)(6)→262.256(a)(3)**	
6.		Maintains records documenting arrangements with response agencies or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made.-**262.17(a)(6)→262.256(b)**	
7.		If a generator has 24-hour response capabilities in lieu of arrangements, obtains a waiver of arrangements with emergency response agencies-**262.17(a)(6)→262.256(c)**	

√ - in compliance X – not in compliance NA – not applicable

C.4. Contingency Planning

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Has contingency plan-**262.17(a)(6)→262.260(a)**	
2.		Reviews and amends contingency plan when (a) regulations are revised; (b) the plan fails in an emergency; (c) the generator's operations materially change to increase risk of fire, explosions, or releases; (d) the ECs change; or (e) the emergency equipment changes-**262.17(a)(6)→262.263(a) through 263(e)**	
3.		Submits contingency plan to emergency response agencies-**262.17(a)(6)→262.262(a)**	
4.		Includes in contingency plan description of actions needed to respond to fires, explosions, or releases of hazardous wastes-**262.17(a)(6)→262.261(a)**	
5.		Includes in contingency plan description of arrangements with local emergency agencies, as appropriate-**262.17(a)(6)→262.261(c)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
6.		Identifies EC(s) by name (or by position title for 24-hour facilities) and lists emergency telephone number(s) in contingency plan- **262.17(a)(6)→262.261(d)**	
7.		Keeps list of ECs up-to-date-**262.17(a)(6)→262.261(d)**	
8.		If more than one EC, designates one as primary and lists the others in the order they will assume responsibility as alternates-**262.17(a)(6)→262.61(d)**	
9.		Lists in contingency plan and describes emergency equipment, its location, and its capabilities- **262.17(a)(6)→262.261(e)**	
10.		Includes in contingency plan complete evacuation plan, including route, signal, and alternate route (if required)- **262.17(a)(6)→262.261(f)**	
11.		Prepares a quick reference guide and submits it to emergency response agencies (new facilities beginning operations after May 30, 2017, or facilities revising the contingency plan after that date)- **262.17(a)(6)→262.262(b)**	
12.		Includes in the quick reference guide: (1) list and description of hazardous waste described in layman's terms; (2) estimated maximum amounts of each hazardous waste; (3) identification of any hazardous waste that would result in unique or special medical issues; (4) a map showing where hazardous waste is generated or managed and access routes to these locations; (5) a map of the facility in relation to surrounding businesses, schools, and residential areas to allow access and evacuation planning; (6) locations of water supplies; (7) identification of on-site notification systems or alarms; and (8) name and 24/7 telephone number for the EC- **262.17(a)(6)→262.262(b)(1) through (b)(8)**	
13.		Updates and resubmits quick reference guide to emergency response agencies when needed- **262.17(a)(6)→262.262(c)**	

√ - in compliance X – not in compliance NA – not applicable

11. Notes/Observations: _____

C.5. Personnel Training

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Trains hazardous waste personnel to perform their duties in a way that ensures compliance using a program of classroom instruction, online training (e.g., computer-based or electronic), or on-the-job training-**262.17(a)(7)(i)(A)**	
2.		Ensures instructor trained in hazardous waste management procedures-**262.17(a)(7)(i)(B)**	
3.		Includes in hazardous waste training: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required-**262.17(a)(7)(i)(C)**	
4.		Initially trains new employees within 6 months of employment or assignment to the generator or position-**262.17(a)(7)(ii)**	
5.		Refreshes hazardous waste training annually-**262.17(a)(7)(iii)**	
6.		Tracks specific job titles and names of persons filling positions-**262.17(a)(7)(iv)(A)**	
7.		Describes, in writing, skills, education or qualification, and duties associates with each job title-**262.17(a)(7)(iv)(B)**	
8.		Prepares written description of type and amount of introductory and continuing training-**262.17(a)(7)(iv)(C)**	
9.		Maintains documentation confirming training has been completed-**262.17(a)(7)(iv)(D)**	
10.		Maintains training records of current employees and for 3 years of former employees-**262.17(a)(7)(v)**	

√ - in compliance X – not in compliance NA – not applicable

11. Notes/Observations: _____

C.6. RCRA Air Emissions

1. Location of records: _____

2. Person responsible for records: _____

3. Applicability:

Subpart AA. Does the generator have any hazardous waste management unit using the following processes: distillation, fractionation, thin- film evaporation, solvent extraction, air stripping and steam stripping?
☐YES, complete **APPENDIX 2-3.A** checklist ☐NO

Subpart BB equipment. Does the generator have any valves, flanges, or pumps that contain or contact hazardous wastes with >10% organics?
☐YES, complete **APPENDIX 2-3.B** checklist ☐NO

Subpart CC tanks and containers. Are any units at the facility subject to the CC Rule (managing hazardous waste with concentrations of volatile organic compounds of 500 ppmw or greater)?
☐YES, continue ☐NO, explain: _____

Does the generator manage volatile organic waste only:

- In DOT-compliant containers with volumes less than 122 gallons OR
- In DOT-compliant containers greater than 122 gallons (not light liquid service)?

☐YES, generator is in compliance with Subpart CC ☐NO, complete **APPENDIX 2-3.C** checklist

C.7. Wastes Received From Very Small Quantity Generators

1. Does the generator receive waste from another generator facility? ☐Yes ☐No, continue to **APPENDIX 1-6.C.8**
2. If yes, is the facility from which the waste was received also under control of the operator of this LQG?
   ☐Yes ☐No-**cite for operating a TSDF**
3. If yes, is the facility from which the waste was received a very small quantity generator (less than 100 kg of hazardous waste and less than 1 kg of P-listed hazardous waste per month)?
   ☐Yes, complete **APPENDIX 2-4** checklist ☐No, **cite for operating a TSDF without a permit**

C.8. Reporting and Re-notification

#	√/X/NA	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
1.		Submits Biennial Report-**262.41**	
2.		Re-notifies for hazardous waste activity-**262.18(d)(2)**	

√ - in compliance X – not in compliance NA – not applicable

C.9. Closure of Container Accumulation or Tanks

1. Are any CAAs or accumulation tanks that were in use during a previous inspection no longer in use?

   ☐No

   ☐Yes, Describe:_____

APPENDIX 1-7. VISUAL REVIEW

A. SATELLITE ACCUMULATION AREA(S) (SAA)

1. Total number of satellite areas inspected at facility: _____

2. SAAs observed at the facility

SAA #	SAA Name or Location	Waste Type	Volume of Waste	Container Type

3. For any SAAs **with compliance issues,** describe below. Note: if an area claimed by the facility as a SAA is (a) not at or near the point of generation, (b) not under control of the operator, OR (c) has quantities exceeding 55 gallons (or 1 kg or 1 quart of P-listed waste) for longer than 3 days, the area should be considered a CAA and inspected using the CAA checklist for the generator category (262.15(a)).

REGULATORY REQUIREMENTS	**SA__**	**SA__**	**SA__**	**SA__**	**SA__**	**SA__**
Labels containers as "Hazardous Waste"-**262.15(a)(5)(i)**						
Labels containers with an indication of the nature of the hazard-**262.15(a)(5)(ii)**						
Keeps containers closed when not adding waste or for **temporary** venting-**262.15(a)(4)**						
Uses containers that are in good condition-**262.15(a)(1)**						
Uses containers that are compatible with waste-**262.15(a)(2)**						
Does not put incompatible wastes in the same container-**262.15(a)(3)(i)**						
Does not put wastes in an unwashed container that previously held an incompatible waste-**262.15(a)(3)(ii)**						
Separates containers of incompatible waste or protects them from each other-**262.15(a)(3)(iii)**						

√ - in compliance X – not in compliance NA – not applicable

Above Satellite Areas with problems:

SA__: Name/Location of area: _____

Person responsible for area: _____

SA__: Name/Location of area: _____

Person responsible for area: _____

SA__: Name/Location of area: _____

Person responsible for area: _____

SA__: Name/Location of area: _____

Person responsible for area: _____

SA__: Name/Location of area: _____

Person responsible for area: _____

SA__: Name/Location of area: _____

Person responsible for area: _____

APPENDIX 1-7. VISUAL REVIEW

C. LARGE QUANTITY GENERATOR (LQG) REQUIREMENTS

C.1. Required Response Equipment

Note: Per 262.15(a)(8), this equipment must be available even if waste is only accumulated in SAAs.

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Operates to minimize possibility of a fire, explosion, or release-**262.17(a)(6)→262.251**	
2.		Provides an internal communications or alarm system-**262.17(a)(6)→262.252(a)**	
3.		Provides device available for and capable of summoning emergency assistance-**262.17(a)(6)→262.252(b)**	
4.		Provides adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-**262.17(a)(6)→262.252(c)**	
5.		Provides adequate water supply for fire control equipment-**262.17(a)(6)→262.252(d)**	
6.		Tests communication and emergency equipment-**262.17(a)(6)→262.253**	
7.		Has communication equipment immediately accessible when waste is being handled-**262.17(a)(6)→262.254(a)**	
8.		Has communication equipment immediately accessible when only one person present on site-**262.17(a)(6)→262.254(b)**	
9.		Provides adequate aisle space for type of waste management and emergency equipment used-**262.17(a)(6)→262.255**	

√ - in compliance X – not in compliance NA – not applicable

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C.2. Container Accumulation Area (CAA)

1. Name_____

(Complete one form per CAA)

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
2.		Uses containers that are in good condition-**262.17(a)(1)(ii)**	
3.		Uses containers that are compatible with waste-**262.17(a)(1)(iii)**	
4.		Keeps containers closed-**262.17(a)(1)(iv)(A)**	
5.		Does not open, handle, or manage containers in a manner to cause them to leak-**262.17(a)(1)(iv)(B)**	
6.		Inspects CAA weekly -**262.17(a)(1)(v)**	
7.		Keeps containers of ignitable/reactive waste more than 50 feet from property line-**262.17(a)(1)(vi)(A)**	
8.		Takes measures to prevent accidental ignition or reaction of ignitable/reactive waste, including separation from ignition sources, smoking/open flame restrictions, and "No Smoking" signs-**262.17(a)(1)(vi)(B)**	
9.		Does not put incompatible wastes in the same container-**262.17(a)(1)(vii)(A)**	
10.		Does not put wastes in an unwashed container that previously held an incompatible waste-**262.17(a)(1)(vii)(B)**	
11.		Separates containers of incompatible waste or protects them from each other-**262.17(a)(1)(vii)(C)**	
12.		Labels containers as "Hazardous Waste"-**262.17(a)(5)(i)(A)**	
13.		Labels containers with an indication of the nature of the hazard-**262.17(a)(5)(i)(B)**	
14.		Marks containers with accumulation start dates-**262.17(a)(5)(i)(C)**	
PRE-TRANSPORT REQUIREMENTS			
15.		Packs, labels, and marks container per DOT requirements-**262.30, 262.31,262.32, respectively**	
16.		Provides placards for use by transporters when applicable-**262.33**	
17.		Marks containers with all applicable EPA hazardous waste numbers-**262.11(g)**	

√ - in compliance X – not in compliance NA – not applicable

18. Container inventory: ☐Actual Count ☐Approximate count

Waste Type	Oldest Date	Volume per Container	# of Containers	Total Volume

Total Quantity (pounds, gallons, etc.): _____

19. How were container volumes verified? _____

20. Container management area location noted on map or diagram: ☐YES ☐NO

21. Notes/Observations: _____

C.3. Tank Accumulation Area(s)

1. Total number of tanks at facility: _____

Assessing EXISTING tanks (tanks used for storage or treatment and that are in operation, or for which installation commenced on or prior to July 14, 1986) without secondary containment:

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
2.		Has independent PE assess all existing tanks-**262.17(a)(2)→265.191(a)**	
3.		Assesses existing systems that store material which became hazardous waste subsequent to July 14, 1986-**262.17(a)(2)→265.191(c)**	
4.		Includes in assessment the following: design standards, characteristics of waste, existing corrosion protection, age, leak test for non-enterable tanks, and ancillary equipment-**262.17(a)(2)→265.191(b)**	

√ - in compliance X – not in compliance NA – not applicable

Assessing NEW (a tank that will be used for storage or treatment and for which installation has commenced after July 14, 1986, except for variance purposes) tank systems:

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
5.		Has independent PE assess all existing tanks**-262.17(a)(2)→265.192(a)**	
6.		Includes in assessment the following: design standards, characteristics of waste, corrosion protection (completed by corrosion expert), tightness prior to use-**262.17(a)(2)→265.192(a)(1-5)**	
7.		Has independent PE perform installation inspection-**262.17(a)(2)→265.192(b)**	
8.		Maintains certification statements of design and inspection-**262.17(a)(2)→265.192(g)**	

√ - in compliance X – not in compliance NA – not applicable

#	REGULATORY REQUIREMENTS	Tank #___	Tank #___	Tank #___	Tank #___	Tank #___
9.	Labels tanks “Hazardous Waste”-**262.17(a)(5)(ii)(A)**					
10.	Labels tanks with an indication of the nature of the hazard-**262.17(a)(5)(ii)(B)**					
11.	Maintains inventory logs, monitoring equipment, or other records to demonstrate that hazardous waste has been emptied within 90 days (batch process), OR provides means to demonstrate that estimated volumes of hazardous waste entering the tank daily exit within 90 days (continuous process)-**262.17(a)(5)(ii)(C)**					

#	REGULATORY REQUIREMENTS	Tank #___	Tank #___	Tank #___	Tank #___	Tank #___
12.	Has inventory logs or records to demonstrate 90-day compliance on site, and is readily available for inspection-**262.17(a)(5)(ii)(D)**					
13	Installs secondary containment (sec. cont.) for all tanks in the following categories: new; installed after July 14, 1986; over 15 years old, or unknown age in facility over 15 years old; repaired, replaced, or reinstalled after July 14, 1986-**262.17(a)(2)→265.193(a)**					
14	Constructs sec. cont. material of impervious and compatible material-**262.17(a)(2)→265.193(c)(1)**					
15.	Has sec. cont. capable of preventing failure due to settlement, compression, or uplift-**262.17(a)(2)→265.193(c)(2)**					
16.	Puts ancillary equipment in sec. cont., except aboveground piping, welded flanges, joints, connections, sealless or magnetic pumps, pressurized piping with automatic shutoff devices, if inspected daily-**262.17(a)(2)→265.193(f)**					
17.	Installs leak detection system for sec. cont., capable of detecting leaks within a 24-hr. period-**262.17(a)(2)→265.193(c)(3)**					
18.	Removes spilled or leaked waste and precipitation from sec. cont. within 24 hrs. or as soon as possible-**262.17(a)(2)→265.193(c)(4)**					
19.	Has sec. cont. capable of containing 100% of largest tank-**262.17(a)(2)→265.193(e)(1)(i)**					
20.	Installs and operates spill & overflow prevention controls (check valves, dry disconnects, level sensing devices, high-level alarms, automatic feed cutoffs, maintenance of sufficient freeboard, etc.)-**262.17(a)(2)→265.194(b)**					
21.	Uses tank compatible with waste or treatment method-**262.17(a)(2)→265.194(a)**					
22.	Does not put incompatible wastes in the same tank-**262.17(a)(2)→265.199(a)**					
23.	Treats and accumulates ignitable/reactive waste per NFPA's buffer zone requirements-**262.17(a)(2)→265.198(b)**					
24.	Treats and accumulates ignitable/reactive wastes so as to prevent ignition-**262.17(a)(2)→265.198(a)**					
25.	Inspects daily the following: spill/overflow equipment, aboveground portions of tank system, sec. cont. & data from monitoring equipment-**262.17(a)(2)→265.195(a)**					

#	REGULATORY REQUIREMENTS	Tank #___	Tank #___	Tank #___	Tank #___	Tank #___
26.	Inspects cathodic protection systems annually and impresses current systems every 2 months- **262.17(a)(2)→265.195(b)**					

Tank #____ – Name & location of tank: ____________________

Tank design capacity: ____________________ Type of waste in tank: ____________________

Volume currently in the tank: ____________________ How was volume verified? ____________________

Person responsible for tank area: ____________________

Area noted on map or diagram: ☐ YES ☐ NO

Age of tank when it first stored/treated/held a hazardous waste: ____________________

How was age verified? ____________________

Tank #____ – Name & location of tank: ____________________

Tank design capacity: ____________________ Type of waste in tank: ____________________

Volume currently in the tank: ____________________ How was volume verified? ____________________

Person responsible for tank area: ____________________

Area noted on map or diagram: ☐ YES ☐ NO

Age of tank when it first stored/treated/held a hazardous waste: ____________________

How was age verified? ____________________

Tank #____ – Name & location of tank: ____________________

Tank design capacity: ____________________ Type of waste in tank: ____________________

Volume currently in the tank: ____________________ How was volume verified? ____________________

Person responsible for tank area: ____________________

Area noted on map or diagram: ☐ YES ☐ NO

Age of tank when it first stored/treated/held a hazardous waste: ____________________

How was age verified? ____________________

Tank #____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: ☐ YES ☐ NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank #____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: ☐ YES ☐ NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

APPENDIX 1-7. VISUAL REVIEW

E. USED OIL

Complete **APPENDIX 1-4** to describe used oil waste streams.

E.1. Prohibitions

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Complies with all 40 CFR 264 or 265 requirements for surface impoundments and waste piles utilized to manage used oil-**279.12(a)**	
2.		Does not utilize used oil as a dust suppressant-**279.12(b)**	
3.		Burns off-specification used oil fuel for energy recovery only in industrial furnaces, industrial boilers, utility boilers, used oil-fired space heaters, or hazardous waste incinerators identified in 40 CFR Part-**279.12(c)(1-3)**	

√ - in compliance X – not in compliance NA – not applicable

Used oil activities:

☐ Generator	Complete this section
☐ Collection Centers and Aggregation Points (40 CFR 279 Subpart D)	Complete this section
☐ Transporters and Transfer Centers (40 CFR 279 Subpart E)	Complete Appendix 2-5.A
☐ Processors and Re-Refiners (40 CFR 279 Subpart F)	Complete Appendix 2-5.B
☐ Burners Who Burn Off-Specification Used Oil for Energy Recovery (40 CFR 279 Subpart G)	Complete Appendix 2-5.C
☐ Used Oil Fuel Marketers (40 CFR Subpart H)	Complete Appendix 2-5.D

E.2. Standards for Used Oil Generators and Used Oil Collection/Aggregation Points

For collection centers and aggregation points, citation is 279.30(b), 279.31(b)(1), or 279.32(b) referencing citation below.

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		If not a VSQG, manages mixtures of hazardous waste and used oil according to 279.10(b)-**cite 262.11 for deficiency**	
2.		Rebuts the presumption that listed hazardous waste has been mixed with used oil for used oil containing more than 1,000 ppm total halogens-**cite 262.11 for deficiency**	
3.		Stores used oil only in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265-**279.22(a)**	
4.		Stores used oil in containers and ASTs that are (1) in good condition and (2) have no visible leaks-**279.22(b)(1) and (b)(2)**	
5.		Labels containers and ASTs “Used Oil”-**279.22(c)(1)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
6.		Labels or marks fill pipes used for underground tanks as "Used Oil"-**279.22(c)(2)**	
7.		Upon detection of a release, (1) stops the release, (2) contains the release, (3) cleans up and manages used oil and other materials, and (4) repairs or replaces the containers or tanks prior to returning them to service, if necessary-**279.22(d)(1) through (d)(4)**	
8.		Burns only its own or household DIY used oil-**go to APPENDIX 2-5.C for deficiency**	
9.		Burns used oil in a < 0.5M BTU/hr space heater that is vented to ambient air-**go to APPENDIX 2-5.C for deficiency**	
10.		If no tolling agreement, ensures that used oil is transported only by a transporter that has obtained an EPA ID number-**279.24**	
11.		If tolling agreement is in place, includes in the contract the following: (1) type of used oil and frequency of shipments, (2) requirement that the vehicle transporting the used oil to and from generator is owned by the processor/re-refiner, and (3) requirement that the reclaimed oil will be returned to generator-**279.24(c)(1) through (c)(3)**	
12.		Transports its own used oil in its own vehicles, in quantities less than 55 gallons at a time, to a recognized used oil collection center-**279.24(a)/go to APPENDIX 2-5.A FOR DEFICIENCY**	
13.		Transports its own used oil in its own vehicles, in quantities less than 55 gallons at a time, to an aggregation point owned by generator-**279.24(b)/go to APPENDIX 2-5.A FOR DEFICIENCY**	

√ - in compliance X – not in compliance NA – not applicable

E.3. Standards for Used Oil Collection/Aggregation Points

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Has registered with or received a license from the local or state government-**279.31(b)(2)**	

√ - in compliance X – not in compliance NA – not applicable

F. UNIVERSAL WASTE (UW)

Complete **APPENDIX 1-4** to describe universal waste streams.

Universal waste activities:

☐ Small Quantity Handler (less than 5,000 kg accumulated at any time)	Complete this section
☐ Large Quantity Handler (less than 5,000 kg accumulated at any time)	Complete Appendix 2-6.A
☐ Transporters (40 CFR 273 Subpart D)	Complete Appendix 2-6.B
☐ Destination Facilities (40 CFR 273 Subpart E)	Complete Appendix 2-6.C

F.1. General

Note: Facilities that are not VSQGs that transport universal waste to a universal waste handler or destination facility must comply with all requirements for universal waste transporters (complete Appendix 2-6.B).

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Does not dispose of universal waste on site-**273.11(a)**	
2.		Does not dilute or treat universal waste, except for responding to releases per 273.17 or by managing specific wastes per 273.13 (waste management)-**273.11(b)**	
3.		Does not accumulate universal waste for longer than 1 year-**273.15(a)**	
4.		Demonstrates the length of time that the universal waste has been accumulated-**273.15(c)**	
5.		Trains employees responsible for management of universal waste in proper handling and emergency procedures-**273.16**	
6.		Immediately contains all releases of universal wastes and other residues from universal wastes-**273.17(a)**	
7.		Makes a hazardous waste determination on any materials resulting from a release or from any materials (such as electrolytes) generated from management of universal waste-**cite 262.11 for deficiency**	
8.		If a VSQG facility, transports universal waste to a universal waste handler or destination facility-**262.14(a)(5)(vii)**	

√ - in compliance X – not in compliance NA – not applicable

F.2. Universal Waste Lamps

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Keeps universal waste lamps in containers or packages that are closed, structurally sound, compatible, and lack evidence of leakage, spillage, or damage that could cause leakage-**273.13(d)(1)**	
2.		Immediately contains universal waste lamps that show evidence of breakage or damage-**273.13(d)(2)**	
3.		Labels containers of universal waste lamps "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)"-**273.14(e)**	

√ - in compliance X – not in compliance NA – not applicable

F.3. Universal Waste Batteries

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Immediately contains universal waste batteries that show any evidence of leakage or other damage-**273.13(a)(1)**	
2.		Labels individual batteries or their containers "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"-**273.14(a)**	

√ - in compliance X – not in compliance NA – not applicable

F.4. Universal Waste Mercury-Containing Equipment (MCE)

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Immediately contains universal waste MCE that show any evidence of leakage or other damage-**273.13(c)(1)**	
2.		Removes mercury ampules from MCE only with all health and safety requirements in place-**273.13(c)(2)(i) through (2)(vi)**	
3.		Stores mercury ampule from MCE in closed containers, packed to prevent breakage-**273.13(c)(2)(vii) through (2)(viii)**	
4.		Labels individual MCE or their containers "Universal Waste-Mercury Containing Equipment," or "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment"-**273.14(d)(1)**	
5.		Labels individual MCE thermostats or their containers "Universal Waste-Mercury Thermostat(s)," or "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"-**273.14(d)(2)**	

√ - in compliance X – not in compliance NA – not applicable

F.5. Universal Waste Pesticides

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Keeps universal waste pesticides in containers that are closed, structurally sound, compatible, and lack evidence of leakage, spillage, or damage that could cause leakage-**273.13(b)(1)**	
2.		If universal waste pesticides are managed in a tank, ensures that tank meets requirements of 40 CFR 265 Subpart J-**273.13(b)(1)**	
3.		Overpacks universal waste pesticides in noncompliant containers in a container compliant with 273.13(b)(1)-**273.13(b)(2)**	
4.		Keeps universal waste pesticides in a transport vehicle/vessel that is closed, structurally sound, compatible, and lacks evidence of leakage, spillage, or damage which could cause leakage-**273.13(b)(4)**	
5.		Labels recalled universal waste pesticides (1) with the original product label or appropriate DOT label as identified in 49 CFR 172, and (2) "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"-**273.14(b)(1) and (b)(2)**	
6.		Labels unused pesticide products with at least one of the following: (i) the label that was on the product when purchased, if still legible; (ii) the appropriate label required under DOT regulation; or (iii) another label prescribed or designated by the state waste pesticide collection program-**273.14(c)(1)(i) through (1)(iii)**	
7.		Labels unused pesticide products with "Universal Waste- Pesticide(s)" or "Waste-Pesticide(s)"-**273.14(c)(1)(2)**	

√ - in compliance X – not in compliance NA – not applicable

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APPENDIX 1-8. EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☐Yes ☐No

☐Identified/verified that violations from previous inspection were corrected (if applicable)
☐Addressed all unresolved inspection-related issues
☐Summarized findings and observations for the facility representatives

NOV issued? ☐ Yes ☐ No ☐ Violations identified and explained, including circumstances, location, and regulations

☐Explained importance of a timely (14-day) and adequate response
☐Explained that findings and observations are based on your current knowledge of RCRA, and that final findings may differ
☐Explained that compliance officer will make final decisions and that all compliance questions should be directed toward the compliance officer
☐Explained that recommendations provided are for informational purposes only and DO NOT require specific actions
☐Provided facility with CBI form
☐Prepared Document Receipt form
☐Provided compliance assistance materials

3. Specific information requested from facility? ☐Yes ☐No

4. Facility appears to have awareness of RCRA regulations? ☐Yes ☐No

5. Facility has its own environmental staff? ☐Yes ☐No

6. Facility has copy of applicable regulations? ☐Yes ☐No

7. Attitude and demeanor of facility representative(s); ☐OK ☐Not OK

8. Notes/Observations: _____