

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

- | | | | |
|---|---|---|--|
| <input type="checkbox"/> Containers | <input type="checkbox"/> Tanks | <input type="checkbox"/> Processing Equipment | <input type="checkbox"/> Loading Areas |
| <input type="checkbox"/> Unloading Areas | <input type="checkbox"/> Security Devices | <input type="checkbox"/> Open Drums | <input type="checkbox"/> Stressed Vegetation |
| <input type="checkbox"/> Unusual Staining | <input type="checkbox"/> Unusual Odors | <input type="checkbox"/> Obvious Discharges | <input type="checkbox"/> Improper Disposal |
| <input type="checkbox"/> Safety Concerns | <input type="checkbox"/> 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

B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

1. Has the generator episodically generated >1,000 kg of hazardous waste or 1 kg of P-listed waste per month
 Yes, complete **APPENDIX 2-2.B** to determine generator status No, continue with **APPENDIX 1-6.B**
2. Is all hazardous waste reclaimed under a contractual agreement? Yes No, go to **APPENDIX 1-6.B.1**
3. If yes, is the type of waste and frequency of shipments specified in the agreement?
 Yes, continue No, go to **APPENDIX 1-6.B.1**
4. If yes, is the vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator owned and operated by the reclaimer of the waste?
 Yes, continue No, go to **APPENDIX 1-6.B.1**
5. If yes, does the generator maintain a copy of the reclamation agreement in its files for a period of at least 3 years after termination or expiration of the agreement?
 Yes, does the generator maintain the LDR Notice for the initial shipment and copy of LDR Notice kept for 3 years after termination of agreement? Yes No, cite for **268.7(a)(10)**
 No, go to **APPENDIX 1-6.B.1**

B.1. Manifests

#	v/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)	

#	v/X/NA	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
13.		Submits exception report if necessary- 262.42	
14.		Sends LDR notification/certification with manifests on first shipment- 262.16(b)(7)→268.7(a)(2)	
15.		Includes manifest number, correct EPA waste codes & treatment standards, and waste analysis data on LDR notification/certification- 262.16(b)(7)→268.7(a)(2)	
16.		Maintains LDR notification/certification/waste analysis data and other documents for 3 years- 262.16(b)(7)→268.7(a)(8)	

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

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

18. Approximate number of manifests reviewed: _____

19. Copies of manifests made? YES NO

B.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: _____

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
3.		Does not dilute waste impermissibly to meet LDR standards- 262.16(b)(7)→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)- 262.16(b)(7)→268.7(a)(2)	

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
11.		Submits a one-time written notice to TSDf with initial shipment and a copy placed in file- 262.16(b)(7)→268.7(a)(2)	
12.		Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition- 262.16(b)(7)→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- 262.16(b)(7)→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- 262.16(b)(7)→268.7(a)(2)	
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- 262.16(b)(7)→268.7(a)(2) and (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- 262.16(b)(7)→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- 262.16(b)(7)→268.7(a)(3)(i)	
18.		If waste is not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i)- 262.16(b)(7)→268.9(a)	
19.		If waste is land disposed, determines if waste meets the treatment standards specified in 268 Subpart D- 262.16(b)(7)→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- 262.16(b)(7)→268.9(d)	

v - 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: _____

B.3. Preparedness/Prevention and Training

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Designates an emergency coordinator and that person is on site or on-call- 262.16(b)(9)(i)	
2.		Posts emergency coordinator's name and phone number, fire department's phone number, and locations of fire extinguishers and spill control equipment near the phone- 262.16(b)(9)(ii)	
3.		Makes arrangements with local emergency agencies- 262.16(b)(8)(vi)(A)	
4.		Familiarizes coordinating agencies with layout, waste types, access points, evacuation routes, and likely casualty types- 262.16(b)(8)(vi)(A)(2)	
5.		In the event of more than one responding FD or PD, designates a primary agency - 262.16(b)(8)(vi)(A)(3)	
6.		Maintains records documenting arrangements with response agencies- 262.16(b)(8)(vi)(B)	
7.		In the event of a fire or spill, immediately responds or coordinates with a response agency or contractor- 262.16(b)(9)(iv)	
8.		Familiarizes all employees with waste handling and emergency procedures relevant to their responsibilities- 262.16(b)(9)(iii)	

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

9. Notes/Observations: _____

B.4. Re-Notification (effective 2021)

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Renotifies EPA of hazardous waste activity every 4 years by September 1- 262.18(d)(1)	

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)						

V - 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

B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

B.1. Required Response Equipment and Hazard Management

Note: Per 262.15(a)(7), this equipment must be available even if waste is accumulated only in SAAs.

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Operates to minimize possibility of a fire, explosion, or release- 262.16(b)(8)(i)	
2.		Provides an internal communications or alarm system- 262.16(b)(8)(ii)(A)	
3.		Provides device available for and capable of summoning emergency assistance- 262.16(b)(8)(ii)(B)	
4.		Provides adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)- 262.16(b)(8)(ii)(C)	
5.		Provides adequate water supply for fire control equipment- 262.16(b)(8)(ii)(D)	
6.		Tests and maintains communication and emergency equipment- 262.16(b)(8)(iii)	
7.		Has communication equipment immediately accessible when waste is being handled- 262.16(b)(8)(iv)(A)	
8.		Has communication equipment immediately accessible when only one person present on site- 262.16(b)(8)(iv)(B)	
9.		Provides adequate aisle space for type of waste management and emergency equipment used- 262.16(b)(8)(v)	

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

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B.2. Container Accumulation Area (CAA)

1. Name _____
 (Complete one form per CAA)

2. Type of accumulation: <180 day <270 day

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
3.		Uses containers that are in good condition- 262.16(b)(2)(i)	
4.		Uses containers that are compatible with waste- 262.16(b)(2)(ii)	
5.		Keeps containers closed- 262.16(b)(2)(iii)(A)	
6.		Does not open, handle, or manage containers in a manner to cause them to leak- 262.16(b)(2)(iii)(B)	
7.		Inspects CAA weekly- 262.16(b)(2)(iv)	
8.		Does not put incompatible wastes in the same container- 262.16(b)(2)(v)(A)	
9.		Does not put wastes in an unwashed container that previously held an incompatible waste- 262.16(b)(2)(v)(B)	
10.		Separates containers of incompatible waste or protects them from each other- 262.16(b)(2)(v)(C)	
11.		Labels containers as "Hazardous Waste"- 262.16(b)(6)(i)(A)	
12.		Labels containers with an indication of the nature of the hazard- 262.16(b)(6)(i)(B)	
13.		Marks containers with accumulation start dates- 262.16(b)(6)(i)(C)	
PRE-TRANSPORT REQUIREMENTS			
14.		Packs, labels, and marks container per DOT requirements- 262.30, 262.31, 262.32, respectively	
15.		Provides placards for use by transporters when applicable- 262.33	
16.		Marks containers with all applicable EPA hazardous waste numbers- 262.11(g)	

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

17. Container inventory: Actual Count Approximate count

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

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

18. How were container volumes verified? _____

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

20. Notes/Observations: _____

B.3. Tank Accumulation Area(s)

1. Total number of tanks at facility: _____

2. Type of accumulation: <180 day <270 day

#	REGULATORY REQUIREMENTS	Tank # ___	Tank # ___	Tank # ___	Tank # ___	Tank # ___
3.	Accumulates reactive waste and mixture of incompatible wastes so that it does not: (1) generate extreme heat or pressure, fire, or explosion, or violent reaction; (2) produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health; (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; (4) damage the structural integrity of the device or facility containing the waste; or (5) via other like means threaten human health or the environment- 262.16(b)(3)(ii)(A)→265.17(b)(1) through (b)(5)					
4.	Ensures wastes are not likely to cause corrosion or other tank failure- 262.16(b)(3)(ii)(B)					
5.	Ensures tanks have 2 feet of freeboard or containment system- 262.16(b)(3)(ii)(C)					
6.	Equips continuously fed tanks with feed cut-off system or by-pass system- 262.16(b)(3)(ii)(D)					
7.	Inspects daily: waste feed cut-off/by-pass system, monitoring equipment, freeboard, & tank levels- 262.16(b)(3)(iii)(A)					
8.	Records data gathered from pressure and temperature gauges daily- 262.16(b)(3)(iii)(B)					
9.	Measures waste level daily- 262.16(b)(3)(iii)(C)					
10.	If tanks have full secondary containment AND documented leak detection equipment/procedures, inspects weekly for items 6-8 above- 262.15(b)(3)(iv)					
11.	Conducts weekly inspections of tanks for leaks, discharges, & corrosion- 262.16(b)(3)(iii)(D)					
12.	Conducts weekly inspections of areas around tanks for leaks or discharges- 262.16(b)(3)(iii)(E)					
13.	Treats or accumulates ignitable/reactive wastes so as to prevent ignition OR uses a tank only for emergencies- 262.16(b)(3)(vii)(A)					
14.	Treats or accumulates ignitable/reactive waste per NFPA's buffer zone requirements- 262.16(b)(3)(vii)(B)					

#	REGULATORY REQUIREMENTS	Tank #___	Tank #___	Tank #___	Tank #___	Tank #___
15.	Does not put incompatible wastes in same tank- 262.16(b)(3)(vii)(C)(1)					
16.	Does not put wastes in an unwashed container that previously held an incompatible waste- 262.16(b)(3)(vii)(C)(2)					
17.	Labels tanks as "Hazardous Waste"- 262.16(b)(6)(ii)(A)					
18.	Labels tanks with an indication of the nature of the hazard- 262.16(b)(6)(ii)(B)					
19.	Demonstrates that tanks are emptied within 180/270 days using inventory logs, monitoring equipment, or other records- 262.16(b)(6)(ii)(C)					
20.	Has inventory logs or records demonstrating accumulation time available for inspection- 262.16(b)(6)(ii)(D)					

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

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? _____

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APPENDIX 1-7. VISUAL REVIEW

E. USED OIL

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

E.1. Prohibitions

#	v/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)	

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

Used oil activities:

<input type="checkbox"/> Generator	Complete this section
<input type="checkbox"/> Collection Centers and Aggregation Points (40 CFR 279 Subpart D)	Complete this section
<input type="checkbox"/> Transporters and Transfer Centers (40 CFR 279 Subpart E)	Complete Appendix 2-5.A
<input type="checkbox"/> Processors and Re-Refiners (40 CFR 279 Subpart F)	Complete Appendix 2-5.B
<input type="checkbox"/> Burners Who Burn Off-Specification Used Oil for Energy Recovery (40 CFR 279 Subpart G)	Complete Appendix 2-5.C
<input type="checkbox"/> 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.

#	v/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)	

#	v/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	

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

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

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

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

APPENDIX 1-7. VISUAL REVIEW

F. UNIVERSAL WASTE (UW)

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

Universal waste activities:

<input type="checkbox"/> Small Quantity Handler (less than 5,000 kg accumulated at any time)	Complete this section
<input type="checkbox"/> Large Quantity Handler (less than 5,000 kg accumulated at any time)	Complete Appendix 2-6.A
<input type="checkbox"/> Transporters (40 CFR 273 Subpart D)	Complete Appendix 2-6.B
<input type="checkbox"/> 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: _____

