

## 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: \_\_\_\_\_



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**

**A. VERY SMALL QUANTITY GENERATOR (VSQG) REQUIREMENTS**

1. Has the generator episodically generated >100 kg of hazardous waste or 1 kg of P-listed waste per month  
 Yes, complete Appendix 2-2.A to determine generator status     No, continue with **APPENDIX 1-6.A**
2. Does the generator use the manifest system (not required)?     Yes     No  
 Were manifests collected to document observations (for example, disposal facilities)?     Yes  No

**A.1. 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.		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- <b>262.14(a)(2)→262.11(a)</b>	
4.		Determines whether a waste meets any of the listings in 40 CFR 261 Subpart D- <b>262.14(a)(2)→262.11(c)</b>	
5.		Determines whether a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C- <b>262.14(a)(2)→262.11(d)</b>	

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

**A.2. Allowable Disposition of Hazardous Waste**

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		If sent off site, sends hazardous waste to a permitted or interim status TSDF, a recognized municipal solid waste landfill, a recognized non-municipal nonhazardous waste landfill, a legitimate recycler, or a LQG under control of the same person as the VSQG- <b>262.14(a)(5)</b>	
2.		Does not send free liquids to a landfill for disposal- <b>262.14(b)</b>	

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

**A.3. Wastes to be Consolidated at LQGs Under the Control of the Generator**

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Marks containers as “Hazardous Waste”- <b>262.14(a)(5)(viii)(B)(1)</b>	
2.		Labels containers with an indication of the nature of the hazard- <b>262.14(a)(5)(viii)(B)(2)</b>	

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

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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- <b>279.12(a)</b>	
2.		Does not utilize used oil as a dust suppressant- <b>279.12(b)</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- <b>279.12(c)(1-3)</b>	

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)- <b>cite 262.11 for deficiency</b>	
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- <b>cite 262.11 for deficiency</b>	
3.		Stores used oil only in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265- <b>279.22(a)</b>	
4.		Stores used oil in containers and ASTs that are (1) in good condition and (2) have no visible leaks- <b>279.22(b)(1) and (b)(2)</b>	
5.		Labels containers and ASTs “Used Oil”- <b>279.22(c)(1)</b>	

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
6.		Labels or marks fill pipes used for underground tanks as "Used Oil"- <b>279.22(c)(2)</b>	
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- <b>279.22(d)(1) through (d)(4)</b>	
8.		Burns only its own or household DIY used oil- <b>go to APPENDIX 2-5.C for deficiency</b>	
9.		Burns used oil in a < 0.5M BTU/hr space heater that is vented to ambient air- <b>go to APPENDIX 2-5.C for deficiency</b>	
10.		If no tolling agreement, ensures that used oil is transported only by a transporter that has obtained an EPA ID number- <b>279.24</b>	
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- <b>279.24(c)(1) through (c)(3)</b>	
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- <b>279.24(a)/go to APPENDIX 2-5.A FOR DEFICIENCY</b>	
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- <b>279.24(b)/go to APPENDIX 2-5.A FOR DEFICIENCY</b>	

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- <b>279.31(b)(2)</b>	

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- <b>273.11(a)</b>	
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)- <b>273.11(b)</b>	
3.		Does not accumulate universal waste for longer than 1 year- <b>273.15(a)</b>	
4.		Demonstrates the length of time that the universal waste has been accumulated- <b>273.15(c)</b>	
5.		Trains employees responsible for management of universal waste in proper handling and emergency procedures- <b>273.16</b>	
6.		Immediately contains all releases of universal wastes and other residues from universal wastes- <b>273.17(a)</b>	
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- <b>cite 262.11 for deficiency</b>	
8.		If a VSQG facility, transports universal waste to a universal waste handler or destination facility- <b>262.14(a)(5)(vii)</b>	

√ - 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- <b>273.13(d)(1)</b>	
2.		Immediately contains universal waste lamps that show evidence of breakage or damage- <b>273.13(d)(2)</b>	
3.		Labels containers of universal waste lamps "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)"- <b>273.14(e)</b>	

√ - 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- <b>273.13(a)(1)</b>	
2.		Labels individual batteries or their containers "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"- <b>273.14(a)</b>	

√ - 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- <b>273.13(c)(1)</b>	
2.		Removes mercury ampules from MCE only with all health and safety requirements in place- <b>273.13(c)(2)(i) through (2)(vi)</b>	
3.		Stores mercury ampule from MCE in closed containers, packed to prevent breakage- <b>273.13(c)(2)(vii) through (2)(viii)</b>	
4.		Labels individual MCE or their containers "Universal Waste-Mercury Containing Equipment," or "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment"- <b>273.14(d)(1)</b>	
5.		Labels individual MCE thermostats or their containers "Universal Waste-Mercury Thermostat(s)," or "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"- <b>273.14(d)(2)</b>	

√ - 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- <b>273.13(b)(1)</b>	
2.		If universal waste pesticides are managed in a tank, ensures that tank meets requirements of 40 CFR 265 Subpart J- <b>273.13(b)(1)</b>	
3.		Overpacks universal waste pesticides in noncompliant containers in a container compliant with 273.13(b)(1)- <b>273.13(b)(2)</b>	
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- <b>273.13(b)(4)</b>	
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)"- <b>273.14(b)(1) and (b)(2)</b>	
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- <b>273.14(c)(1)(i) through (1)(iii)</b>	
7.		Labels unused pesticide products with "Universal Waste- Pesticide(s)" or "Waste-Pesticide(s)"- <b>273.14(c)(1)(2)</b>	

√ - 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: \_\_\_\_\_  
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