This checklist is intended solely to assist inspectors in structuring an inspection and to help them ensure that common regulatory issues are not overlooked. It is not necessarily intended to represent an accurate record of the inspector's findings or observations. Notations and other comments on the checklist are not always to be viewed as direct observations by the inspector or actual fact, but may instead reflect claims by facility personnel or tentative responses which require further investigation for confirmation.

REVISED EPCRA/DATA QUALITY INSPECTION CHECKLIST

Name of Facility: _____

Chemicals of Interest: _____

_____

Reporting Year(s) of Interest: _____

I. General Information Regarding Facility

1. Describe the industrial process(es) performed at this facility during the reporting year(s) of interest.

_____

_____

_____

_____

_____

_____

(attach process diagram(s) if possible)

2. Identify which of the following are utilized by the facility in its industrial processing or chemical handling areas.

Floor Drains	_____
Other Drains for Liquids	_____
Exhaust Fans	_____
Hoods	_____
Vents	_____
Ducts	_____
Sumps	_____
Open tanks, vats, etc.	_____
Slop Sinks	_____

3. How many full-time equivalent employees did the facility have during the reporting year(s) of interest?

_____

_____

_____

4. Have the facility's process operations changed significantly during the reporting year(s) of interest? (include equipment, production rates, product substitution or elimination, etc.)? yes no

If yes, describe;

_____

_____

_____

_____

5. Has the facility implemented any new treatment technologies during the reporting year(s) of interest? yes no

If yes, describe:

_____

_____

_____

_____

6. Has the facility implemented any new pollution prevention initiatives during the reporting year(s) of interest? yes no

If yes, describe:

_____

_____

_____

_____

7. Briefly describe the facility's housekeeping practices, particularly in industrial processing, receiving/unloading, storage and pollution control areas.

II. General Information Regarding Facility's Form R's

1. For what years did the facility submit a Form R?

2. Did the facility submit a Form R every year that it was required to? yes no

If no, explain:

3. Did the facility have the same personnel available to complete all of its Form R's? yes no

If no, describe changes:

4. Show in the following table the chemicals for which the facility completed a Form R for the reporting year(s) of interest.

Chemical Name (* if mixture)		
Year	Year	Year

5. Is there any indication that the facility either failed to report a particular chemical when it should have or mistakenly reported a chemical when it shouldn't have?
   yes no

If yes, describe:

_____

_____

_____

_____

6. Has the facility received and provided where appropriate supplier notification material for all Section 313 chemicals in mixtures or in trade name products?
   yes no N/A

If no, describe:

_____

_____

_____

_____

7. Did the facility submit any revised Form R reports for the reporting year(s) of interest? yes no

If yes, answer questions 8 and 9.

8. List the chemical(s) which had revised Form R's submitted.

_____

_____

_____

9. Describe below the reason(s) that the facility submitted revised Form R's.

_____

_____

_____

_____

10. Based on findings of this inspection, does the facility need to submit a revised Form R? yes no

_____If yes, explain reason:

_____

_____

_____

_____

11. Did the facility use the alternate threshold provision for any of the chemicals or years of interest (i.e., combined quantity of amounts shown in Sections 8.1 thru 8.7 is less than 500 lb)? yes no

If yes, was the facility correct in its use of this provision?
yes no

If no, describe:

_____

_____

_____

_____

III. Use Threshold Determination

Chemical Name _____ **Year** _____

1. How is this chemical used at the facility? (check all that apply)

___ **Manufacture** - To produce, prepare, compound or import a listed chemical. Also includes coincidental production of listed chemical (i.e., as byproduct or impurity) as a result of manufacture, processing, otherwise use or treatment of other chemical substances. (25,000 lb threshold)

___ Produce for onsite use or processing

___ Produce for sale or distribution in commerce

___ Import for onsite use or processing

___ Import for sale or distribution in commerce

___ Produced as by-product or impurity (% = ___) of process

___ By-product of waste treatment

___ **Process** - Intentional incorporation of listed chemical into a product. Includes preparation (can produce change in physical or chemical state) of listed chemical after its manufacture for distribution in commerce. General categories include chemical reactant (raw materials, intermediates), formulation component, article component and repackage. (25,000 lb threshold)

___ Chemical reactant - Chemical used in a chemical reaction that results in the manufacture of another chemical substance or a product. Examples include feedstocks, raw materials, intermediates and initiators.

___ Formulation Component - Chemical that is added to a product (or product mixture) for the purpose of enhancing its performance. Examples include additives, dyes, initiators, solvents, inhibitors, emulsifiers, surfactants, lubricants and flame retardants.

___ Article Component - A listed chemical that becomes an integral

component of an article.

___ Repackage - Processing or preparation of a listed chemical (or product mixture) for distribution in commerce in a different form, state or quantity.

___ **Otherwise Use** - Not intentionally incorporated into a product distributed in commerce. Includes chemical processing aid, manufacturing aid and ancillary use. (10,000 lb threshold)

___ Chemical Processing Aid - A chemical that is added to a reaction mixture to aid in the manufacturing or synthesis of another chemical substance but is not intended to remain in or become part of the product or product mixture. Examples include solvents, catalysts, inhibitors, initiators, reaction terminators and solution buffers.

___ Manufacturing Aid - A chemical that aids the manufacturing process but does not become part of the resulting product and is not added to the reaction mixture during the manufacture or synthesis of another chemical substance. Examples include lubricants, metalworking fluids, coolants, refrigerants and hydraulic fluids.

___ Ancillary or other use - A chemical that is used for purposes other than aiding chemical processing or manufacturing. Examples include cleaners, de-greasers, lubricants, fuels, chemicals for treating wastes and solvents in paints or other coatings that volatilize.

___ Further management of chemical containing waste received from off-site (includes disposal, treatment, destruction and stabilization).

2. Is the chemical subject to any of the following exemptions (check all that apply)

___ Contained in an article (article must be a pre-manufactured item (i.e., manufactured prior to arrival at facility) that is formed to a specific shape or design during its manufacture and whose end-use functions depend upon its shape or design. It must not release a listed chemical under normal conditions).

___ Concentration of chemical below de minimis level (0.1 % for carcinogens, 1.0 % for others)

___ Laboratory chemical

___ Structural component

___ Routine janitorial/facility grounds maintenance

___ Personal employee use

___ Motor vehicle maintenance

___ Intake water component

3. What was the basis of the estimate used by the facility for the amount manufactured, processed, or otherwise used during the reporting year of interest? (check all that apply)

___ Purchase/inventory records

___ Emission factors

___ Mass balance

___ MSDSs from suppliers

___ Process recipes

___ Monitoring data

___ Production data

___ Assumption w/o calculations

___ Other (specify)

4. List in the table below the quantities of this chemical that the facility estimated as its use for the reporting year of interest and any different quantities that the inspector computed (blanks mean that the inspector agrees with the facility's estimate). Inspector's calculations should be attached to report.

Description of Use	Facility's Estimate	Inspector's Estimate
Amount Manufactured		
Amount Processed		
Amount Otherwise Used		

5. What was the maximum amount of this chemical on-site at any time?

_____

6. Based on the information obtained during this inspection does it appear that this was a reasonable estimate? yes no

If no, describe:

_____

_____

_____

7. With respect to the threshold determination for this chemical did the inspector identify any of the following problems? (check as necessary)

___ Overlooked use of chemical

___ Mis-classified use of chemical

___ Incorrectly applied/interpreted exemption(s)

___ Failure to use best or all available data

___ Required/supporting documentation was missing

___ Calculation error

___ Supplier information was missing

___ Calculated quantity of parent metal not metal compound

__ Use threshold determination not based on throughput but amount purchased or released

___ Calculations based on TCLP not total concentration of metals

Comments (note any disagreements):

IV. Release Estimates

Chemical Name _____ **Year** ____

1. Type of Release:_____

2. Is documentation of release estimates, including monitoring data, available? yes no

3. What was the method of estimating this release? (see table below)

_____

Method	Code	Release Category			
		Air Fugitive	Air Point	Water Release	Land Release
Monitoring Data or Measurements	M	***	***	***	**
Mass Balance	C	**	*	**	***
Emission Factors	E	***	**	N/A	N/A
Other Approaches including Engineering Estimates/Assumptions	O	*	*	*	*

(*** indicates most preferred; * indicates least preferred)

4. Which of the following material does the facility have and use for purposes of estimating releases (check all that apply)

___ Engineering calculations

___ Stack testing

___ Outfall monitoring

___ Hazardous waste analysis

___ Other monitoring data

___ Manufacturer’s estimates of treatment efficiencies

___ RCRA manifests

___ AP-42 or other EPA emission factors

___ Non-published emission factors

___ Other trade association chemical specific or non specific factors

___ Spill/release event records

___ Inventory records

___ Process feed/utilization rates

___ Volatilization rates

___ Solubilities

___ Raoult’s Law constants

___ Henry’s Law constants

5. What was the quantity of release estimated by the facility

_____

6. What was the method preferred by the inspector given the circumstances at this facility?

_____

7. If inspector preferred a different method of release estimation indicate the quantity of release that was computed using that method and attach calculations to report.

_____

8. Did the inspector identify any of the following problems relating to the facility's method of estimating this release? (check as necessary)

____ Source of release not considered (i.e., vent, duct, drain, stack, pumps, valves, flanges, volatilization from open units, stormwater runoff, treatment or other residues, accidental spills, etc.)

____ All existing data were not utilized

____ Recycled material assumed to be a release

____ Quantity based on metal compound not parent metal

____ Mistakenly applied de minimus rule

____ Calculation error

____ Neutralized acid mis-reported

____ Questionable emission factors assumed

____ Questionable treatment efficiency assumed

____ Mis-classifying fugitive and stack emissions

____ On-site treatment processes not included in release calculations

____ Other

Comments (note any disagreements):

_____

_____

_____

_____

_____

_____

V. Off Site Transfers

Chemical Name _____ **Year** _____

1. Type of Off Site Transfer: _____

2. Is documentation of estimates of off site transfers, including monitoring or other data, available? yes no

3. What was the method of estimating this off site transfer? (some possible methods shown in table in previous section)

   _____

4. What was the quantity of this off site transfer estimated by the facility

   _____

5. What was the method preferred by the inspector given the circumstances at this facility?

   _____

6. If the inspector preferred a different method of estimating this off site transfer indicate the quantity that resulted using that method and attach necessary documentation to report.

   _____

7. Did the inspector identify any of the following problems relating to the facility's method of estimating this off site transfer? (check as necessary)

   ____ Source of off site transfer not considered (OST's should include any material sent off site for purposes of waste treatment, disposal, recycling, or energy recovery <u>after</u> any on site waste treatment, recycling or removal is completed)

   ____ All existing data were not utilized

   ____ Quantity based on metal compound not parent metal

   ____ Mistakenly applied de minimus rule

   ____ Calculation error

   ____ Neutralized acid mis-reported

   ____ Questionable treatment efficiency assumed

Comments (note any disagreements):

WERE THE FOLLOWING OBSERVED DURING THE FACILITY TOUR (CHECK AS NECESSARY)

____ Floor drains/sumps in chemical use area

____ Exhaust fans in chemical use area

____ Vents/ducts in chemical use area

_____Open tanks/vats/drums containing volatile material

____ Chemicals not reported

___ Excess chemicals in storage (i.e., inconsistent with facility's usage or reported 'maximum on site at any one time')

____ Waste generation not reported

____ Releases not reported

____ Chemical use inconsistent with Form R report

____ Spills, leaks, unexpected releases

____ On site recycling

____ Poor housekeeping

Comments: _____