

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.

EPA GENERATOR CHECKLIST

(Does not apply to Universal Waste Handlers)

Name of Facility: _____

Address of Facility: _____

EPA I.D. Number: _____

Name/Title of Facility

Representative: _____

I. General

1. Provide a brief description of the type of operation(s) that produces hazardous waste at this facility:

2. Does the facility perform the following on-site:

a. storage (>90 day or >180 day for SQG) of hazardous waste? yes no

b. treatment of hazardous waste? yes no

c. disposal of hazardous waste? yes no

(if yes, complete appropriate TSD checklists)

261.4

3. Is the facility subject to any exclusions for its hazardous waste? yes no

If yes, list the waste and the basis for exclusion:

262.11(c)

4. Has the facility properly determined whether all of its waste exhibits any of the characteristics of hazardous waste?
yes no

If yes, describe what this determination was based upon (i.e., testing or knowledge of process/materials used).

If no, describe omissions:

5. Has the facility failed to notify EPA/State of any of its hazardous waste management activities, including locations of all hazardous waste accumulation areas? yes no

If yes, describe: _____

II. Manifest

Complete this section only if facility ships hazardous waste off-site.

262.20(a)

1. Does the facility use the Uniform Hazardous Waste Manifest whenever transporting hazardous waste? yes no

If no, explain: _____

If yes, review a representative number of manifests and indicate whether they contain:

a. Generator's name, mailing address, telephone number and EPA ID number? yes no

b. Transporter's name and EPA ID number? yes no

c. DOT waste description, including proper shipping name, hazardous waste class and DOT identification number?
yes no

d. Number and type of containers (if applicable)?
yes no

e. Quantity of each waste transported? yes no

f. Name, EPA ID number and site address of facility designated to receive the waste? yes no

g. The following certification? yes no

"I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and environment."

262.23(a)

2. Did the generator:

- a. Sign and date the manifest? yes no
- b. Obtain the handwritten signature and date of acceptance from the initial transporter? yes no
- c. Ensure that return copies of the manifest from the designated TSD facility were properly signed and dated?
yes no
- d. Retain a copy of the signed manifest for at least three years? yes no

The inspector should obtain copies of any manifests that are found to have problems.

III. Pre-Transport Requirements

Complete this section only if the facility ships hazardous waste off site.

1. Is there any indication that the facility is:

262.30

- a. Not packaging its waste in accordance with DOT regulations (49 CFR Parts 173, 178 and 179)?
yes no

262.31

- b. Not labelling each package in accordance with DOT regulations (49 CFR Part 172)? yes no

262.32(a) & (b)

- c. Not marking each container of 110 gallons or less with the words "hazardous waste ----" or each package of hazardous waste in accordance with DOT regulations (49 CFR Part 172)? yes no

If yes, explain: _____

262.33

2. Does the facility placard or offer the transporter placards for its hazardous waste shipments? yes no

IV. Waste Accumulation

1. Does the facility utilize the following types of hazardous waste accumulation:

a. Satellite accumulation? yes no

b. Less than 90 day storage? yes no

Answer the following questions if the generator has satellite accumulation area(s).

262.34(c)(1)

2. Is satellite accumulation area(s) near the point of waste generation and under the control of the operator of the process actually generating the waste? yes no

If no, describe: _____

262.34(c)(1)

3. Are there multiple satellite accumulation areas for any one process that generates hazardous waste? yes no

If yes, describe: _____

262.34(c)(1)

4. Is the waste stored in container(s)? yes no

265.171

5. Are container(s) in good condition? yes no

If no, explain: _____

262.34(c)(1)

6. Are container(s) marked with the words "hazardous waste" or the actual contents of the container(s)? yes no

265.173(a)

7. Are container(s) kept closed? yes no

265.171

8. Are any container(s) leaking? yes no

If yes, describe: _____

262.34(c)(1)

9. Has the facility accumulated more than 55 gallons of hazardous waste or more than 1 quart of acutely hazardous waste in a satellite accumulation area? yes no

If yes:

262.34(c)(2)

a. Are the container(s) holding excess waste dated as to when accumulation began? yes no

b. Does the excess waste comply with the less than 90 day storage requirements (40 CFR Part 262.34(a)) within three days of the time when accumulation of such excess waste began? yes no

Answer the following questions if the facility has less than 90 day storage.

262.34(a)(4)

10. Does the facility maintain personnel training and other records required in 40 CFR Part 265.16? yes no

If yes, do these records include:

265.16(d)(1)

a. Job title for each position related to hazardous waste management and the employee filling each job?
yes no

265.16(d)(2)

b. A written job description for each position?
yes no

265.16(d)(3)

c. A written description of the type and amount of training that will be given to each person?
yes no

265.16(d)(4)

d. Records that document that the training or job experience required by facility personnel to effectively respond to emergencies and otherwise manage hazardous waste in a proper manner has been successfully completed?
yes no

265.16(b)

11. Have facility personnel successfully completed the required training or job experience within six months after occupying the position? yes no

265.16(c)

12. Do facility personnel take part in an annual review of the initial training requirements and update them as necessary?
yes no

262.34(a)(4)

13. Does the facility maintain an adequate preparedness and prevention program as required in 40 CFR Part 265 Subpart C?
yes no

Is the facility equipped with:

265.32(a)

a. Internal communications or alarm system? yes no

265.32(b)

b. Telephone or hand-held two-way radio? yes no

265.32(c)

c. Portable fire extinguishers or other fire control equipment, spill control equipment and decontamination equipment? yes no

265.32(d)

d. Adequate volume of water? yes no

265.33

14. Does the facility test and maintain the above equipment to assure its proper operation? yes no

265.35

15. Is there sufficient aisle space to allow the unobstructed movement of personnel and equipment to areas where hazardous waste are located in the event of an emergency? yes no

265.37(a)(1)

16. Has the facility made arrangements with local authorities to familiarize them with the layout of the facility and the nature/hazards of the hazardous waste handled at the facility?
yes no

262.34(a)(4)

17. Has the facility prepared a contingency plan and is it maintained at the facility? yes no

If yes, does it contain the following:

265.52(a)

a. Description of the actions that are to be taken in case of an emergency (all potential types of emergencies should be identified)? yes no

265.52(c)

b. Description of arrangements made with local authorities? yes no

265.52(d)

c. Current list of emergency coordinators' names,

addresses and phone numbers (office and home)?
yes no

265.52(e)

d. List of all emergency equipment at the facility, including locations, descriptions and relevant capabilities? yes no

265.52(f)

e. Evacuation plan for facility personnel? yes no

The inspector should obtain a copy of the facility's contingency plan if any problems are found.

265.53(b)

18. Were copies of the contingency plan submitted to local authorities that may provide emergency services? yes no

19. Has the facility's contingency plan ever failed in an emergency? yes no N/A

If yes:

265.54(b)

a. Was the contingency plan immediately amended?
yes no

265.54(c), (d) & (e)

20. Was the contingency plan amended when either the facility or its operations, list of emergency coordinators or list of emergency equipment had changed? yes no N/A

If no, describe: _____

265.56(j)

21. If the contingency plan is implemented, does the facility record the time, date and details of the incident in its operating log and submit a written report of the incident to the Regional Administrator or the appropriate state agency within 15 days? yes no N/A

262.34(a)(1)

22. What is the method of waste storage:

Containers? yes no

Tanks? yes no

Containment Buildings? yes no

Other? yes no

If other, describe: _____

If the facility uses either containers or tanks for <90 day waste accumulation the inspector will need to complete the appropriate sections of the Air Emission Standards Checklist (40 CFR 265 Subpart CC). (Effective Date - December 6, 1996)

Answer the following questions if the facility uses container storage.

262.34(a)(2)&(3)

23. Are the container(s) marked with the words "Hazardous Waste" and the date that waste accumulation in that container begins? yes no

262.34(a)

24. Based upon accumulation dates, have any container(s) been in storage for more than 90 days? yes no

If yes, the inspector should complete the appropriate TSD checklists.

265.171

25. Are container(s) in good condition? yes no

If no, explain: _____

265.172

26. Are container(s) made of or lined with materials which will not react with or be incompatible with the waste they are storing? yes no

265.173(a)

27. Are container(s) kept closed? yes no

265.173(b)

28. Are containers(s) opened, handled or stored in a manner which may rupture the container or cause it to leak?

yes no

If yes, describe: _____

265.171

29. Are any container(s) leaking? yes no

If yes, describe: _____

265.174

30. Are container storage area(s) inspected at least weekly and is an adequate inspection record/log maintained?

yes no

If no, explain: _____

265.176

31. Are container(s) holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? yes no N/A

32. Are incompatible wastes placed in the same container(s)?

yes no

If yes:

265.177(a) & 265.17(b)

a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxic emissions occurred? yes no

If yes, describe: _____

265.177(c)

33. Are container(s) holding incompatible hazardous waste properly separated or protected from one another while in storage? yes no N/A

If no, explain: _____

Answer the following questions if the facility uses tank storage.

262.34(a)(3)

34. Is the tank(s) labelled or clearly marked with the words "Hazardous Waste"? yes no

262.34(a)

35. Is the tank marked with the date that waste accumulation begins in that tank(s) or does the facility have in its records when waste accumulation started in that tank(s)?
yes no

262.34(a)

36. Based upon accumulation dates, has the facility stored hazardous waste in its tank(s) for longer than 90 days?
yes no

If yes, the inspector should complete the appropriate TSD checklists.

37. Which of the following describes the type of tank(s) employed at this facility (circle the appropriate one)?

- a. Indoor - not on impermeable floor
- b. Indoor - on impermeable floor
- c. Outdoor - above ground
- d. Outdoor - in ground
- e. Outdoor - underground

38. What is the approximate age of the tank(s)?

265.191

39. Does the tank(s) appear to be in good condition?
yes no can't tell

If no, describe: _____

265.191

40. Is the tank(s) leaking? yes no can't tell

If yes, describe: _____

265.193

41. Is the tank(s) provided with an effective secondary containment system? yes no

If yes, describe: _____

If no:

265.191(a)

a. Does the facility have a written assessment reviewed and certified by an independent, qualified, registered professional engineer that attests to the tank(s)'s structural integrity? yes no

265.191(b)

42. Was a leak test performed on the tank(s)? yes no

If yes, provide date of most recent test: _____

265.194(b)

43. Is the tank(s) provided with adequate controls to prevent spills and overflows (i.e., automatic feed cutoff, bypass to another unit, high level alarms, etc.)? yes no

265.194(b)

44. Is there sufficient freeboard (2 feet) in uncovered tanks to prevent overtopping by wave or wind action or precipitation? yes no N/A

265.195(a)

45. Is the tank(s) inspected each operating day? yes no

If yes, do inspections include:

265.195(a)(1)

a. Overfill/spill control equipment? yes no

265.195(a)(2)

b. Aboveground portions of the tank(s) for corrosion or releases? yes no N/A

265.195(a)(3)

c. Data gathered from monitoring equipment and leak detection equipment? yes no

265.195(a)(4)

d. Area immediately surrounding the externally accessible portion of the tank(s) and secondary containment system for signs of erosion or releases? yes no N/A

265.195(b)(1)

46. Does the facility perform annual inspections of the cathodic protection systems, if present?
yes no N/A

265.195(c)

47. Does the facility properly document all of the results of its tank system inspections? yes no

265.196

48. Is there any indication that the facility did not properly respond to spills or leaks from a tank(s) (this would include failure to stop the spill/leak, failure to clean up spilled/leaked material, failure to minimize migration, failure to remove tank from service immediately, failure to provide notification, etc.)? yes no

If yes, describe: _____

49. Does the facility store any ignitable or reactive waste in its tank(s)? yes no

If yes:

265.198(a)(1)

a. Is the waste treated, rendered or mixed before or immediately after placement in the tank(s) so that it no longer meets the definition of ignitable or reactive waste? yes no

265.198(a)(2)

b. Is the waste stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react? yes no

265.198(a)(3)

c. Is the tank(s) used solely for emergencies?
yes no

265.198(b)

d. Does the tank(s) appear to be a safe distance from the facility's property line and public thoroughfares?
yes no

If no, describe: _____

50. Is there any indication that incompatible wastes are being stored in a tank(s)? yes no

If yes:

265.199(a)

a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxics emissions occurred? yes no

If yes, describe: _____

265.200(a)

51. Are waste analyses or trial treatment tests conducted whenever a tank system is used to store or treat a hazardous waste substantially different from waste previously treated or stored; or used to treat chemically a hazardous waste with a substantially different process than any previously used in that system? yes no N/A

If no:

265.200(b)

a. Has written, documented information on similar waste under similar operating conditions been obtained to show that the proposed treatment or storage will meet the requirements of §265.194(a) (i.e., hazardous waste or treatment reagents must not be placed in a tank system if they could cause the tank, its ancillary equipment or the secondary containment system to rupture, leak, corrode or otherwise fail)? yes no

Answer the following questions if the facility uses containment buildings as a storage unit (effective February 18, 1993).

265.1101(a)(1) & (2)

52. Is the containment building(s) completely enclosed and designed and constructed of man-made materials that are of sufficient strength? yes no

If no, describe: _____

265.1101(a)(3)

53. Is there any indication that incompatible waste is being improperly stored in the containment building? yes no

If yes, describe: _____

265.1101(a)(4)

54. Does the containment building(s) have a primary barrier that appears to be sufficiently durable and effective?

yes no

If no, describe: _____

55. Does the containment building manage hazardous waste containing free liquids? yes no

If no, skip to question 58:

265.1101(b)(2)

56. Is there a liquid collection and removal system available to prevent the accumulation of liquid on the primary barrier?
yes no

If yes, describe the system and the presence/absence of collected liquids: _____

265.1101(b)(3)

57. Is there an effective secondary containment system (i.e., secondary barrier) and a leak detection system capable of detecting failure of the primary barrier? yes no

If no, describe: _____

58. Does the containment building serve as secondary containment for tank(s) placed within the building?
yes no

If yes,

265.1101(b)(3)(iii)

a. Does it appear to meet the secondary containment system requirements for tanks described in §265.193 (i.e., must be compatible with waste, have sufficient strength and durability, and be designed to effectively detect and collect releases of liquid)? yes no

If no, describe: _____

265.1101(c)(1)(i)

59. Is the primary barrier free of significant cracks, gaps, corrosion or other deterioration/openings? yes no

265.1101(c)(1)(ii)

60. Is the hazardous waste stored at a height that exceeds the height of any containment wall? yes no

265.1101(c)(1)(iii)

61. Is any hazardous waste tracked outside of the containment building by personnel or equipment? yes no

265.1101(c)(1)(iv)

62. Are any fugitive emissions exiting the containment building via doors, windows, cracks, vents, etc? yes no

265.1101(c)(2)

63. Does the facility have a certification for the containment building by a qualified registered professional engineer?
yes no

64. Does the facility have an inspection plan for its containment building that establishes an effective inspection program, including a schedule that requires all monitoring/leak detection equipment to be inspected as well as checks for leaks/releases at least every 7 days? yes no

265.1101(c)(3)

65. Is there any indication that the containment building was improperly operated or maintained or that the owner/operator did not respond properly once the detection of a hazardous waste release occurred? yes no

If yes, describe: _____

262.34(a)

66. Does the facility have written documentation showing that procedures are in place to ensure that individual additions and removals of waste to/from the containment building are consistent with the 90 day storage time limit that applies for all wastes managed in the unit? yes no

If waste is being stored in a containment building for greater than 90 days, the inspector should complete the appropriate TSD checklist.

V. Recordkeeping and Reports

262.42((a)(2)

1. Does the facility prepare an Exception Report and submit it to the Regional Administrator if a signed copy of the manifest is not received within 45 days of the date the waste was accepted by the initial transporter? yes no

If yes, does the Exception Report include:

a. Legible copy of the manifest? yes no

b. Cover letter explaining generator's efforts to locate waste and the results of those efforts? yes no

262.41(a)

2. If the facility ships any hazardous waste off-site, does it prepare a Biennial Report (covering the previous year only) and submit it to the Regional Administrator by March 1 of each even numbered year? yes no N/A

If yes, does the Biennial Report include:

262.41(a)(3)

a. Name, address and EPA ID number for each off-site TSD facility to which waste was shipped during the year?
yes no

262.41(a)(4)

b. Name and EPA ID number of each transporter used during the year? yes no

c. Description and quantity of each hazardous waste shipped off-site (listed by EPA ID number of each TSD facility to which it was shipped)? yes no

d. Efforts undertaken during the year to reduce the volume and toxicity of the waste generated?
yes no

e. Description of the changes in volume and toxicity of the waste actually achieved during the year?
yes no

3. Does the facility retain copies of Biennial Reports, Exception Reports and test results/waste analyses for a minimum of 3 years from the date that the waste was last sent to on-site or off-site treatment, storage or disposal?
yes no

[illegible]

SMALL QUANTITY GENERATORS

Answer the following questions if the facility generates a total quantity of hazardous waste between 100 kg and 1000 kg per month and accumulates hazardous waste in quantities not exceeding 6000 kg. If the facility does not satisfy both of the above, it is not a small quantity generator.

Answer questions in General Section (i.e., numbers 1 through 5) of this checklist.

1. Does the facility accumulate hazardous waste on-site?
yes no

If no, skip to question 10.

262.34(d) & (e)

2. Is hazardous waste accumulated on-site for greater than 180 days (or for more than 270 days if waste must be transported over 200 miles)? yes no

If yes, has the facility been granted an extension?
yes no

If yes, describe: _____

265.34(d)(4)

3. Does the facility comply with the Preparedness and Prevention requirements applicable to LQG facilities (refer to questions 13 - 16 in the LQG section of this checklist)?
yes no

262.34(d)(5)(i)

4. Is there an emergency coordinator either on the premises or on call at all times? yes no

262.34(d)(5)(ii)

5. Has the facility posted the following information next to a telephone:

a. Name and telephone number of emergency coordinator?
yes no

b. Location of fire extinguishers, spill control material, fire alarms, etc? yes no

c. Telephone number of fire department, unless a direct alarm is available? yes no

262.34(d)(5)(iii)

6. Has the facility ensured that all appropriate employees are thoroughly familiar with proper waste handling and emergency procedures? yes no

If no, explain: _____

7. Does the facility accumulate hazardous waste in containers?
yes no

If yes, answer questions 23, 25 - 30, 32 and 33 in the LQG section of this checklist.

8. Does the facility accumulate hazardous waste in tanks?
yes no

If yes, answer questions 39, 43 - 45, 49 and 50 in the LQG section of this checklist.

9. Does the facility accumulate hazardous waste in units other than containers or tanks? yes no

If yes, describe: _____

262.20(e)

10. Is the facility's waste reclaimed under a contractual agreement which specifies the type of waste and frequency of shipments involved? yes no

If no, does the facility comply with the manifest requirements applicable to LQGs (refer to manifest related questions in the LQG portion of this checklist)? yes no

262.44

11. Does the facility retain copies of manifests and records of test results or waste analyses for at least three years?
yes no

262.34(d)(4); 268.7(a)(4)

12. If the facility's waste is subject to an exemption allowing it to be land disposed even though it does not meet applicable treatment standards did the facility send, with the initial shipment of waste, a one time written notice to each land disposal facility receiving the waste?
yes no N/A

Additional Comments: _____
