

LDR CHECKLIST FOR T/S/D FACILITIES  
(revised August, 1998)

Name of Facility: \_\_\_\_\_

Address of Facility: \_\_\_\_\_

\_\_\_\_\_

EPA I.D. Number: \_\_\_\_\_

General

1. Does the facility (a) store (b) treat or (c) dispose of hazardous wastes? (Circle appropriate one(s))

2. Is the hazardous waste handled at this facility generated (a) on-site or (b) off-site? (Circle appropriate one(s))

If (b), does this facility also act as a generator of hazardous waste (i.e., ships waste to another TSD facility for further management)?      **Yes**      **No**

If yes, fill out appropriate sections of LDR checklist for generators

3. Does the facility, in any way, mix/aggregate/dilute any of its restricted hazardous waste with another hazardous waste, non-hazardous waste or non-waste material prior to (1) storage, (2) treatment or (3) disposal?      **Yes**      **No**

If no, skip to next section

If yes, circle (1), (2) or (3) and describe below. Note whether dilution of an ignitable, corrosive or reactive waste, except D003 reactive cyanide, occurs as a result of treatment in a permitted facility (includes impoundments). If the treatment method provided is effective for that type of waste or is specified as the technology standard or the prohibited waste is treated in a surface impoundment in accordance with 268.4 this type of dilution is permissible.

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\_\_\_\_\_  
\_\_\_\_\_

**268.3**

4. Based on your observations, does it appear that the facility is using dilution as a substitute for appropriate/legitimate treatment or to improperly switch treatability group (i.e., wastewater vs non-wastewater)?       **Yes**       **No**

If yes, describe as necessary:

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Storage Facilities

**268.50(a)(1)**

5. Does the facility store restricted wastes in containers, tanks or containment buildings for accumulation purposes as necessary to facilitate proper recovery, treatment or disposal?       **Yes**       **No**

**268.50(b)**

6. Does the facility store, in tanks, containers or containment buildings, restricted wastes exceeding treatment standards for longer than one year?       **Yes**       **No**

**268.50(c)**

If yes, can the facility prove that such storage was solely for the purpose of accumulating quantities which are necessary to facilitate proper recovery, treatment or disposal?

**Yes**       **No**

If yes, describe facility's reason:

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**268.50(a)(2)(i)**

7. Are all containers properly marked to identify their contents and dated as to when accumulation begun?       **Yes**       **No**       **N/A**

If no, describe

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**268.50(a)(2)(ii)**

8. Is each tank clearly marked with a description of its contents the quantity of each hazardous waste received and the date each period of accumulation begins or is such information recorded and maintained in the facility's operating record?

**Yes      No      N/A**

If no, describe

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Treatment Facilities

**268.7(b)**

9. Does the facility have a waste analysis plan to facilitate proper testing of wastes/waste extracts to determine compliance with treatment standards?      **Yes      No**

If yes, does the waste analysis plan specify a testing frequency?

**Yes      No**

**268.7(b)**

10. Does the facility test its wastes in accordance with its waste analysis plan?      **Yes      No**

If no, describe

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11. Are the following performed as necessary?

**268.7(b)(1)**

a. TCLP analysis of the extract of treatment residues to determine compliance with applicable treatment standards?

**Yes      No      N/A**

**268.7(b)(2)**

b. Treatment (waste) residue analysis to determine compliance with applicable treatment standards?      **Yes      No      N/A**

**268.7(b)(3)**

12. Did the facility send a one time notice with the initial shipment of waste or contaminated soil to the disposal facility that includes applicable treatment standards and waste analysis data unless the waste is hazardous debris that has been excluded from the definition of hazardous waste under 261.3(e)?

**Yes                      No**

**268.7(b)(4)**

13. Did the facility submit a one time certification with the initial shipment of waste or contaminated soil to the disposal facility stating that the waste has received the proper treatment and is in compliance with applicable treatment standards or prohibitions unless the waste is hazardous debris that has been excluded from the definition of hazardous waste under 261.3(e)?

**Yes                      No**

**268.7(b)(5)**

14. If the treatment facility ships the waste or treatment residue to another treatment/storage facility for further management, does it comply with the notice and certification requirements applicable to generators?                      **Yes                      No                      N/A**

**268.7(b)(6)**

15. Does the treatment facility handle recyclable materials used in a manner constituting disposal?                      **Yes                      No**

If yes:

a. Does the facility (recycler) submit, with each shipment of waste, a certification and a notice to the Regional Administrator?                      **Yes                      No**

b. Does the facility maintain records of the name and location of each entity receiving the hazardous waste derived product?                      **Yes                      No**

16. Does the treatment facility ship hazardous debris that has been excluded from the definition of hazardous waste under 261.3(e)?

**Yes                      No**

If no, skip to question 21

**268.7(d)(1)**

17. Does the facility submit a one-time notification to the Regional Administrator/State Director?                      **Yes                      No**

**268.7(d)(2)**

18. Is the notification updated whenever the type of debris changes, a different technology is used to treat the debris or the debris is shipped to a different facility?      **Yes**      **No**      **N/A**

**268.7(d)(3)**

19. Did the treatment facility document and certify compliance with the treatment standards and were all appropriate records available pertaining to inspections, evaluations, analyses and treatment data?      **Yes**      **No**

**268.7(d)(3)(iii)**

20. For each shipment of treated hazardous debris, is there a certification of compliance with the treatment standards which was signed by a authorized representative and placed in the facility's files?      **Yes**      **No**

**268.9(d)**

21. Does the facility send treated characteristic waste that is no longer hazardous to a Subtitle D landfill?      **Yes**      **No**      **N/A**

If yes:

a. Has it placed a one-time notification and certification in its files and sent a copy to the EPA Regional Administrator/State Director?      **Yes**      **No**

b. Is the notification and certification updated whenever the process or operation generating the waste changes and/or if the Subtitle D facility receiving the waste changes?      **Yes**      **No**      **N/A**

22. Does the facility mix restricted wastes having different waste codes and/or different treatment standards prior to treatment?      **Yes**      **No**

If no, skip to question 25

23. If the waste mixture has both concentration level treatment standards and specified treatment technology, does the facility satisfy both?      **Yes**      **No**      **N/A**

**268.9(b)**

24. If the waste mixture consists of both characteristic and listed wastes, does the facility use all of the treatment standards that are associated with each individual characteristic or listed waste code?      **Yes**      **No**      **N/A**

**268.9(c) & 268.40(e)**

25. Does the treatment facility recognize that, in the case of characteristic wastes, it must also treat any underlying hazardous constituents identified by the generator and/or reasonably expected to be in such wastes?      **Yes**      **No**      **N/A**

26. Based on the above and other observations, does it appear that the facility is providing adequate treatment for its wastes?  
         **Yes**      **No**

If no, describe

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**268.4(a)(2)**

27. Does the facility treat its waste in surface impoundments?  
         **Yes**      **No**

If yes:

**268.4(a)(2)(i)**

a. Are treatment residues (both liquid and sludge) analyzed to determine if they meet the applicable treatment standards?      **Yes**      **No**

**268.4(a)(2)(ii)**

b. Are any treatment residues which do not meet applicable treatment standards removed at least annually and not placed in another surface impoundment?      **Yes**      **No**

Land Disposal Facilities

28. Except where the facility is disposing of any waste that is a recyclable material used in a manner constituting disposal pursuant to 266.20(b), does the facility:

**268.7(c)(1)**

a. Have copies of all notices and certifications from the treatment facilities or waste generators? **Yes** **No**

**265.13(b)**

b. Have an updated waste analysis plan which includes testing frequency? **Yes** **No**

**268.7(c)(2)**

c. Test the waste in accordance with its waste analysis plan to assure that it complies with applicable treatment standards and prohibitions? **Yes** **No**

**268.7(c)(2)**

d. Perform the appropriate tests (ie TCLP vs total waste)?  
**Yes** **No**

**268.40(a)**

29. Were restricted and/or prohibited wastes exceeding the applicable treatment standards or prohibition levels being placed in land disposal units? **Yes** **No**

If yes, describe whether there are any provisions that allow this land disposal and obtain copies of letters granting a petition/variance/exemption.

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**Additional Comments**

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