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 TSD FACILITY 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. Does the facility generate hazardous waste? yes no

(if yes, complete generator checklist)

2. Does the facility manage (i.e. treat, store or dispose) any hazardous waste that is:

a. generated on-site? yes no

b. generated off-site at facility(s) having different ownership? yes no

c. generated off-site by facility(s) having common ownership? yes no

If b. or c. are yes, list (or attach) the names and addresses of the facility(s) which transport its waste to the subject TSD:

_____

_____

_____

_____

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

a. storage of hazardous waste? yes no

b. treatment of hazardous waste? yes no

c. disposal of hazardous waste? yes no

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

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

_____

_____

_____

5. Does the facility contemplate any changes in its operation insofar as the management of hazardous waste is concerned? yes no

If yes, describe: _____

_____

_____

_____

6. Does the facility transport hazardous waste off-site for further management? yes no

If yes, list (or attach) the names and addresses of the facility(s) to which such waste is shipped and answer the questions pertaining to manifests and pre-transport requirements on the generator checklist and attach to this checklist.

7. Has the facility submitted:

a. Part A permit application? yes no

If yes, approximately when? _____

b. Part B permit application? yes no

If yes, approximately when? _____

II. General Facility Standards

265.13(a)(1)
1. Has the facility obtained a detailed chemical and physical analysis of a representative sample of each waste it receives prior to its treatment, storage or disposal? yes no

265.13(a)(3)
2. Is the analysis repeated as necessary to ensure that it is accurate and up to date? yes no

265.13(a)(4)
3. If the facility receives off-site shipments of hazardous waste, does it adequately inspect and, if necessary, analyze each shipment to determine whether it matches the identity specified on the accompanying manifest? yes no N/A

If no, explain: _____

_____

_____

_____

265.13(b)
4. Has the facility developed a written waste analysis plan and, if so, is the plan kept at the facility? yes no

If no, explain: _____

_____

_____

If yes, does the waste analysis plan contain the following:

a. List of wastes to be sampled? yes no

b. Location of sampling? yes no

265.13(b)(1)
c. List of parameters and why they were selected?
yes no

265.13(b)(2)
d. Test methods? yes no

265.13(b)(3)
e. Sampling method to ensure collection of a representative sample? yes no

265.13(b)(4)
f. Frequency of sampling? yes no

265.13(b)(5)
g. Waste analyses that off-site generators have agreed to supply? yes no N/A

265.13(b)(6)

h. Additional waste analysis requirements associated with specific waste management methods? yes no N/A

265.13(b)(6) & 268.7
i. Required updates for LDR (see LDR checklists for more details)? yes no

261.24
j. Replacement of EP Tox with TCLP? yes no N/A

265.13(b)(7)
k. The testing of contents/residues from LDR exempted surface impoundments (268.4(a)) and the procedures for the annual removal of those residues which do not meet applicable treatment standards? yes no N/A

265.13(c)
l. Procedures that will be used by off-site facilities to inspect and, if necessary, sample and analyze each shipment of hazardous waste to ensure that it matches its identity on the accompanying manifest?
yes no N/A

The inspector should obtain a copy of the waste analysis plan if any problems are found.

265.13(b)
5. Does it appear that the facility follows its waste analysis plan? yes no

If no, describe: _____

_____

_____

_____

265.14(b)(1)
6. Does the facility have a 24 hour surveillance system which continually monitors and controls entry to the active portion of the facility? yes no

If no:

265.14(b)(2)(i)
a. Does the facility have an artificial or natural boundary which completely surrounds the active portion of the facility? yes no

265.14(b)(2)(ii)
b. Does the facility have a means to control entry at all times, i.e., attendents, locked entrances, gates,

television monitors, controlled roadway access, etc. yes no

265.14(c)
7. Does the facility have a restricted access sign posted at each entrance to the active portion of the facility, i.e., "Danger - Unauthorized Personnel Keep Out"? yes no

265.15(b)(1) & (2)
8. Does the facility have a written inspection schedule and, if so, is it kept at the facility? yes no

If no, describe: _____

_____

_____

If yes, does it address inspecting:

265.15(b)(1)
a. Monitoring equipment? yes no

b. Safety and emergency equipment? yes no

c. Security devices? yes no

d. Operating and structural equipment? yes no

265.15(b)(4)
e. Loading/unloading areas daily when in use or other areas subject to spills? yes no

265.15(b)(3)
9. Does the inspection schedule identify the types of problems which are to be looked for during the inspection?
yes no

265.15(d)
10. Does the facility record inspection observations in an inspection log? yes no

If yes, does the log include:

a. Date and time of inspection? yes no

b. Name of the inspector? yes no

c. Notation of observations? yes no

d. Date and nature of any repairs or remedial actions?
yes no

The inspector should obtain copies of the inspection schedule or the inspection logs if any problems are found.

11. Are the inspection records kept for at least 3 years from the date of the inspection? yes no

265.15(c)
12. Are there any malfunctions, deficiencies or equipment deterioration problems uncovered during a prior inspection that the facility has failed to correct? yes no

If yes, describe: _____

_____

_____

_____

13. Does the facility maintain personnel training records?
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)
14. Have facility personnel successfully completed the required training or job experience within six months after occupying the position? yes no

265.16(c)
15. Do facility personnel take part in an annual review of the initial training requirements and update them as necessary?
yes no

Answer the following questions if the facility manages either ignitable or reactive waste.

265.17(a)

16. Are ignitable or reactive wastes separated and protected from sources of ignition or reaction? yes no

17. Are there "No Smoking" signs posted wherever a hazard from ignitable or reactive waste exists? yes no

265.17(b)
18. Are ignitable or reactive wastes managed in what appears to be a safe manner (i.e. no generation of extreme heat, pressure, fire or explosion, violent reactions, toxic fumes, etc. or damage to devices holding such wastes)? yes no

If no, describe: _____

_____

_____

Answer the following question if the facility manages incompatible wastes.

265.17(b)
19. Is the mixture or commingling of incompatible wastes, or incompatible wastes and materials conducted in a safe manner? yes no

If no, describe: _____

_____

_____

III. Preparedness and Prevention

1. Does the facility have the following equipment:

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

265.35
3. 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)
4. 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

IV. Contingency Plan

265.51(a) & 265.53(a)
1. 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)
2. Were copies of the contingency plan submitted to local authorities that may provide emergency services? yes no

3. Has the facility's contingency plan ever failed in an emergency? yes no

If yes:

265.54(b)
a. Was the contingency plan immediately amended? yes no

265.54(c),(d) & (e)
4. 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)
5. 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 appropriate state agency within 15 days? yes no N/A

V. Manifest System, Recordkeeping and Reporting

Answer the following questions if the facility receives hazardous waste from off-site.

265.71(a)(1)
1. Does the facility sign and date each copy of the manifest accompanying a hazardous waste shipment? yes no

265.71(a)(2)
2. Does the facility note any significant discrepancies in the manifest (significant discrepancies in quantity are variations greater than 10 % for bulk waste or any variation in piece count for batch waste)? yes no

265.71(a)(4)
3. Does the facility send a copy of the manifest back to the generator within 30 days after the waste was received?
yes no

265.71(a)(5)
4. Does the facility retain a copy of the manifest for at least 3 years? yes no

265.72(b)
5. Does the facility attempt to reconcile any significant discrepancies in the manifest when they are discovered?
yes no N/A

6. If the discrepancy is not resolved within 15 days after receiving the waste, does the facility notify the Regional Administrator in writing? yes no N/A

265.73(a)
7. Does the facility keep a written operating record?
yes no

If yes, does it contain the following:

265.73(b)(1)
a. Description and quantity of each hazardous waste received? yes no

b. Method(s) and date(s) of treatment, storage or disposal? yes no

265.73(b)(2)
c. Location of each hazardous waste within the facility and the quantity at each location? yes no

265.73(b)(3)
d. Records and results of waste analysis? yes no

265.73(b)(4)
e. Details of all incidents that require implementing the contingency plan? yes no N/A

265.73(b)(5)
f. Records and results of inspections? yes no

265.73(b)(6)
g. Monitoring, testing or analytical data and corrective action where required? yes no

265.73(b)(7)
h. Closure/post-closure cost estimates?
yes no N/A

265.73(b)(8)
i. Records of quantities and dates of placement of hazardous waste into land disposal units?
yes no N/A

265.73(b)(9) - (14)
j. Copies of notifications, certifications and demonstrations, if applicable, required by the LDR program? yes no N/A

265.75
8. Does the facility prepare, and submit to the Regional Administrator by March 1 of each even numbered year, a biennial report? yes no

If yes, does it contain the following:

265.75(a)
a. EPA I.D. number, name and address of the facility?
yes no

265.75(b)
b. Calender year covered by the report? yes no

265.75(c)
c. EPA I.D. number of each generator from which the facility received a hazardous waste shipment during the year? yes no N/A

265.75(d)
d. Description and the quantity of each hazardous waste received during the year (for off-site facilities, this information must be listed by EPA I.D. number of each generator)? yes no

265.75(e)

e. Method of treatment, storage or disposal of each hazardous waste? yes no

265.75(f)
f. Groundwater monitoring data? yes no N/A

265.75(g)
g. Most recent closure/post-closure cost estimates? yes no N/A

265.76
9. Has the facility received any hazardous waste from an off-site generator without an accompanying manifest? yes no

If yes:

a. Did the facility prepare and submit to the Regional Administrator, within 15 days after receiving the waste, an unmanifested waste report? yes no

VI. Ground Water Monitoring

Answer the following questions if the facility manages hazardous waste in a land disposal unit.

265.90(a)
1. Has the facility installed a groundwater monitoring system? yes no

If no, describe why: _____

_____

_____

_____

If yes, answer the following:

2. Is the facility presently conducting (a) detection phase groundwater monitoring or (b) assessment phase groundwater monitoring (circle appropriate one)?

265.91(a)(1)
3. Is there at least one monitoring well installed hydraulically upgradient of the waste management area? yes no

265.91(a)(2)
4. Is there at least three monitoring wells installed hydraulically downgradient of the waste management area?
yes no

265.91(a)(2)
5. Do monitoring wells intercept the water within the uppermost aquifer underlying the facility?
yes no unsure

265.91(c)
6. Are all monitoring wells cased, screened, packed or sealed in a manner that enables uncontaminated and representative samples to be collected from the uppermost aquifer?
yes no unsure

If no, explain: _____

_____

_____

_____

265.92(a)
7. Has the facility developed a ground water sampling and analysis plan and is the plan kept at the facility?
yes no

If no, explain: _____

_____

_____

_____

If yes, does it include procedures and techniques for:

265.92(a)(1)
a. Sample collection? yes no

265.92(a)(2)
b. Sample preservation and shipment? yes no

265.92(a)(3)
c. Analytical procedures? yes no

265.92(a)(4)
d. Chain of custody control? yes no

265.92(a)
8. Does the facility appear to follow its sampling and analysis plan? yes no

If no, explain: _____

_____

_____

_____

9. Does the facility's ground water monitoring program include:

265.92(b)(1)
a. Measuring concentrations of "ground water suitability" parameters quarterly during the first year for each well? yes no

265.92(b)(2) & (d)(1)
b. Measuring concentrations of "ground water quality" parameters quarterly during the first year and at least annually afterwards for each well? yes no

265.92(b)(3) & (c)(2) & (d)(2)
c. Measuring concentrations (at least four replicate samples) of "indicators of ground water contamination" parameters quarterly during the first year and at least semi-annually afterwards for each well? yes no

265.92(e)
d. Determining elevation of the ground water surface at each monitoring well each time a sample is collected? yes no

265.93(a)
10. Has the facility prepared an outline of a groundwater quality assessment program? yes no N/A

11. Has the facility's ground water monitoring program been certified by a qualified geologist, hydrologist or geotechnical engineer? yes no

VII. Closure/Post-Closure/Financial Assurance

265.112(a)
1. Does the facility have a written closure plan?
yes no

If yes, answer the following:

a. Has the plan been approved by the State or EPA?
yes no

265.112(c)
b. Has the closure plan been amended as necessary in order to keep it up-to-date? yes no

265.142(a)
c. Is there a detailed and up-to-date written estimate of closure cost? yes no

265.142(d)
d. Is the latest closure cost estimate kept at the facility? yes no

265.118(a)
2. Does the facility have a written post-closure plan?
yes no N/A

If yes, answer the following:

a. Has the plan been approved by the State or EPA?
yes no

265.118(d)
b. Has the post-closure plan been amended as necessary in order to keep it up-to-date? yes no

265.144(a)
c. Is there a detailed and up-to-date written estimate of post-closure cost? yes no

265.144(d)
d. Is the latest post-closure cost estimate kept at the facility? yes no

265.143 & 265.145
3. Does the facility have a means to satisfy its financial assurance requirements? yes no

If yes:

a. What financial mechanisms are used?

_____

_____

_____

b. Does the amount equal or exceed the estimated cost of closure (and post- closure if necessary)? yes no

Complete only the following sections that apply to the facility. If the facility uses containers, tanks or surface impoundments for the storage or treatment of hazardous waste the inspector will need to complete the appropriate sections of the Air Emmission Standards Checklist (40 CFR Subpart CC). (Effective Date - June 6, 1996)

VIII. Containers

265.171
1. Are container(s) in good condition? yes no

If no, explain: _____

_____

_____

265.172
2. 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)
3. Are container(s) kept closed? yes no

265.173(b)
4. Are container(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
5. Are any container(s) leaking? yes no

If yes, describe: _____

_____

_____

265.174
6. Are container storage area(s) inspected at least weekly and is an adequate inspection record/log maintained? yes no

If no, explain: _____

_____

_____

265.176
7. 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

8. 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)
9. Are container(s) holding incompatible hazardous waste properly separated or protected from one another while in storage? yes no N/A

If no, explain: _____

_____

_____

IX. Tanks

1. 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

265.191
2. Does the tank(s) appear to be in good condition?
yes no can't tell

If no, describe: _____

_____

_____

265.191
3. Is the tank(s) leaking? yes no can't tell

If yes, describe: _____

_____

_____

265.193
4. Is the tank(s) provided with an effective secondary containment system? yes no

If yes, describe: _____

_____

_____

265.191(a)
If no, 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)
5. Was a leak test performed on the tank(s)? yes no

If yes, provide date of most recent test: _____

265.194(b)
6. 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)
7. 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)
8. 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)
9. Does the facility perform annual inspections of the cathodic protection systems, if present? yes no N/A

265.195(c)
10. Does the facility properly document all of the results of its tank system inspections? yes no

265.196
11. 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: _____

_____

_____

_____

12. 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: _____

_____

_____

13. 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)
14. 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

X. Surface Impoundments

265.221(a)
1. Is the facility's surface impoundment(s) equipped with two or more liners and a leachate collection system (NOTE: S.I. containing newly listed or identified hazardous waste has 48 months after promulgation to comply-265.221(h))? yes no

If no, describe why: _____

_____

_____

_____

265.222(a)
2. Is there at least two feet of freeboard in the surface impoundment(s)? yes no

If no, how much freeboard is maintained and why: _____

_____

_____

_____

265.223
3. Do all earthen dikes have a protective cover such as grass, shale or rock to maintain structural integrity?
yes no N/A

4. If the facility chemically treats hazardous waste in its surface impoundment, does it:

265.225(a)(2)(i)
a. Conduct waste analyses and trial treatment tests?
yes no N/A

265.225(a)(2)(ii)
b. Have written, documented information on similar treatment of similar waste under similar operating conditions? yes no N/A

265.226(a)(1)
5. Does the facility inspect the freeboard level in its surface impoundment(s) at least once each operating day?

yes no

265.226(a)(2)
6. Does the facility inspect the surface impoundment(s), including dikes and vegetation surrounding the dike at least once each week? yes no

7. Does the facility have any surface impoundments which are not being used or not intended for future use? yes no

If yes:

265.228(a)(1)
a. Has all hazardous waste and hazardous waste residue been removed from the impoundment(s) or decontaminated? yes no

265.228(a)(2)
b. Was the impoundment(s) closed by removing liquid waste or solidifying the remaining waste/residues and covering it with a final cover? yes no

If yes, describe appearance of final cover: _____

_____

_____

_____

8. Are ignitable or reactive wastes placed in a surface impoundment? yes no

If yes:

265.229
a. Do the waste and impoundment(s) satisfy all applicable requirements of the LDR regulations (40 CFR Part 268)? yes no

265.229(a)
b. Are they treated, rendered or mixed before or immediately after placement in the impoundment so that they no longer meet the definition of ignitable or reactive waste? yes no

265.229(b)
c. Are they protected from possible ignition or reaction sources and certified as such by a qualified chemist? yes no

If yes, describe: _____

_____

_____

_____

265.229(c)
d. Is the impoundment(s) used solely for emergencies? yes no

9. Are incompatible wastes placed in the same surface impoundment? yes no

If yes:

265.230
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: _____

_____

_____

_____

XI. Waste Piles

Note: A waste pile used as a disposal unit is a landfill and is subject to the landfill regulations. This section pertains to waste piles that are used strictly for waste storage or treatment.

265.254

1. Is the facility's waste pile(s) equipped with two liners and a leachate collection system? yes no

If no, describe why: _____

_____

_____

_____

265.251

2. Is the waste pile(s) covered or otherwise managed to control wind dispersal? yes no

265.252

3. Does the facility analyze a representative sample of waste from each incoming shipment before adding the waste to any existing pile? yes no N/A

4. Is the leachate or run-off from the pile(s) a hazardous waste? yes no

If yes:

265.253(a)(1)

a. Is the pile(s) on an impermeable base? yes no

265.253(a)(2)

b. Is there an adequately designed and operated run-on control system for the pile(s)? yes no

265.253(a)(3)

c. Is there an adequately designed and operated run-off management system? yes no

265.253(b)(1)

d. Is the pile(s) protected from precipitation and run-on by some other means? yes no

If yes, describe: _____

_____

_____

_____

265.253(b)(2)
5. Are liquids or waste containing free liquids placed in the pile(s)? yes no

6. Are ignitable or reactive wastes placed in the pile(s)? yes no

If yes:

265.256(a)
a. Do the waste and pile(s) satisfy all applicable requirements of the LDR regulations (40 CFR Part 268)? yes no

If no, describe: _____

_____

_____

_____

265.256(a)(1)
b. Is the waste treated, rendered or mixed so it no longer meets the definition of ignitable or reactive? yes no

265.256(a)(2)
c. Is the waste protected from sources of ignition or reaction? yes no

7. Are incompatible wastes placed in the same waste pile? yes no

If yes:

265.257(a)
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: _____

_____

_____

_____

265.257(b)
8. Are waste piles adequately separated or protected from other hazardous waste management units that contain incompatible waste? yes no N/A

265.257(c)
9. Have hazardous wastes been placed on the same area where incompatible wastes were previously piled without first providing sufficient decontamination? yes no

If yes, describe: _____

_____

_____

_____

10. Have any of the facility's waste piles undergone closure? yes no

265.258(a)
If yes, were all waste residues removed or decontaminated? yes no

265.258(b)
If no, was the area closed in accordance with the requirements applicable to landfills? yes no

If no, describe: _____

_____

_____

_____

XII. Land Treatment

Note: Hazardous waste must not be placed in a land treatment unit unless the waste can be made less hazardous or nonhazardous.

265.272(b)
1. Is there an adequately designed and operated run-on control system? yes no

If no, explain: _____

_____

_____

_____

265.272(c)
2. Is there an adequately designed and operated run-off management system which effectively collects all run-off from the land treatment unit? yes no

If no, explain: _____

_____

_____

_____

265.272(e)
3. Is wind dispersal effectively controlled within the land treatment unit? yes no

If no, describe: _____

_____

_____

_____

265.273(a)
4. Has the facility determined the concentrations in the waste of all constituents which exceed the maximum allowable and cause the waste to exhibit the Toxicity Characteristic before placing such hazardous waste in a land treatment unit?

yes no

265.273(b)
5. Has the facility determined the concentrations in any listed waste of any substance which caused the waste to be listed before placing such hazardous waste in a land treatment unit? yes no N/A

6. Does the facility grow any food chain crops within the land treatment unit? yes no

If yes, answer the following questions:

265.273(c)
7. Has the facility determined the concentrations in the waste of arsenic, cadmium, lead and mercury before placing such hazardous waste in a land treatment unit? yes no

265.276(a)
8. Has the facility notified the Regional Administrator that food chain crops are being grown? yes no

265.276(b)(1) & (2)
9. Did the facility prepare the necessary demonstration that food chain crops will not experience any problems with arsenic, lead or mercury based on appropriate field testing? yes no

If yes, describe the information that was used for preparing this demonstration: _____

_____

_____

_____

10. Does the land treatment unit having food chain crops receive any waste that contains cadmium? yes no

If yes:

265.276(c)(1)(i)
a. Was the pH of the soil and waste mixture 6.5 or greater at the time of each waste application?
yes no

If no, did the waste contain cadmium concentrations of 2 mg/kg (dry weight) or less? yes no

265.276(c)(1)(ii)
b. Is the annual application rate of cadmium less than 0.5 kilograms/hectare on land used to produce tobacco, leafy vegetables or root crops grown for human consumption? yes no N/A

For other food chain crops, is the annual cadmium application rate less than or equal to 0.5 kilograms/hectare (beginning January 1, 1987)?
yes no

265.278(a)
11. Has the facility prepared in writing and implemented an unsaturated zone monitoring plan? yes no

If yes, does the plan include:

265.278(b)(1)
a. Soil monitoring? yes no

265.278(b)(2)
b. Soil-pore water monitoring? yes no

265.278(c)(1)
c. Sample depths below waste incorporation? yes no

265.278(c)(2)
d. Number of samples to be taken? yes no

265.278(c)(3)
e. Frequency and time of sampling? yes no

265.278(e)
f. Constituents to be analyzed (must be the same as those found in the waste during waste analysis efforts)?
yes no

12. Does the facility's implementation of its unsaturated zone monitoring plan yield the following:

265.278(a)(1)
a. Detection of the vertical migration of hazardous waste and hazardous waste constituents beneath the land treatment unit? yes no

If no, explain: _____

_____

_____

_____

265.278(a)(2)
b. Information on the background concentrations of the hazardous waste and hazardous waste constituents in similar but untreated soils nearby? yes no

If no, explain: _____

_____

_____

_____

265.279
13. Does the facility's operating record include hazardous waste application dates and rates? yes no

14. Have any of the facility's land treatment units undergone closure? yes no

If yes, were the following issues addressed:

265.280(c)(1)
a. Removal of contaminated soils? yes no

265.280(c)(2)
b. Placement of a final cover? yes no

265.280(d)(1)
c. Continuation of unsaturated zone monitoring? yes no

265.280(d)(2) & (3)
d. Maintenance of run-on control system and run-off management system? yes no

265.280(d)(4)
e. Control wind dispersal of particulates? yes no

15. Are ignitable or reactive wastes placed in a land treatment unit? yes no

If yes:

265.281
a. Do the waste and treatment zone meet all applicable requirements of the LDR regulations (40 CFR Part 268)? yes no

If no, describe: _____

_____

_____

_____

265.281(a)
b. Is the waste immediately incorporated into the soil so that it no longer meets the definition of ignitable or reactive? yes no

265.281(b)
c. Is the waste protected from any sources of ignition or reaction? yes no

16. Are incompatible wastes placed in the same land treatment unit? yes no

If yes:

265.282
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: _____

_____

_____

XIII. Landfills

265.301(a)
1. Is the facility's landfill(s) equipped with two liners and a leachate collection system? yes no

If no, describe why: _____

_____

_____

_____

265.302(a)
2. Is there an adequately designed and operated run-on control system? yes no

265.302(b)
3. Is there an adequately designed and operated run-off management system? yes no

265.302(d)
4. Is the landfill(s) covered or otherwise managed to control wind dispersal? yes no

5. Does the facility maintain the following items in its operating record:

265.309(a)
a. On a map, the exact location and dimensions, including depth, of each cell? yes no

265.309(b)
b. The contents of each cell and the approximate location of each hazardous waste type within each cell?
yes no

6. Have any of the facility's landfills undergone closure?
yes no

If yes, were the following issues addressed:

265.310(a)
a. Was the landfill or cell(s) covered with a final cover? yes no

265.310(a)(1)
b. Minimization of migration of liquids? yes no

265.310(a)(3) & (4)
c. Maintaining adequate drainage? yes no

d. Maintaining the cover's integrity? yes no

7. Are ignitable or reactive wastes placed in the landfill(s)? yes no

If yes:

265.312(a)
a. Do the waste and landfill(s) satisfy all applicable requirements of the LDR regulations (40 CFR Part 268)? yes no

If no, describe: _____

_____

_____

_____

265.312(a)(1)
b. Is the waste treated, rendered or mixed so it no longer meets the definition of ignitable or reactive? yes no

265.312(a)(2)
c. 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: _____

_____

_____

_____

265.312(b)
d. Is the waste protected from sources of ignition or reaction? yes no

8. Are incompatible wastes placed in the same landfill cell? yes no

If yes:

265.313
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: _____

_____

_____

_____

265.314(b)
9. Have any bulk or non-containerized liquid hazardous waste or hazardous waste containing free liquids been placed in a landfill since May 8, 1985? yes no

10. Have any containers holding free liquids been placed in a landfill since March 22, 1982? yes no

If yes:

265.314(c)(1)
a. Has all free-standing liquid been removed?
yes no

b. Has waste been mixed with absorbent or solidified so that free-standing liquid is no longer observed?
yes no

265.314(c)(2)
c. Was container(s) very small, such as an ampule?
yes no

265.314(c)(3)
d. Was container(s) designed to hold free liquids for use other than storage, such as a battery or capacitor?

yes no

265.314(c)(4)
e. Was the container(s) a lab pack? yes no

265.314(f)
11. Are sorbents used to treat free liquids that are to be disposed of in a landfill biodegradable?
yes no N/A

265.314(g)
12. Have any liquids (non-hazardous waste) been placed in a landfill since November 8, 1985? yes no

If yes:

a. Was the EPA Regional Administrator notified and/or did the Regional Administrator approve of the placement of such liquids in the landfill?
yes no

13. Have partially full or empty container(s) been placed in a landfill? yes no

If yes:

265.315(b)
a. Were the container(s) crushed, shredded or similarly reduced in volume? yes no

14. Describe the general appearance of the landfill: _____

_____

_____

_____

_____

_____

_____

XIV. Incinerators

1. Is the facility using (a) incinerator (b) boiler or (c) industrial furnace in order to (a) destroy hazardous waste or (b) for any recycling purpose? (circle the appropriate ones)

2. Describe the type (include waste codes) of hazardous waste being burned at this facility.

_____

_____

_____

265.341

3. Has the facility analyzed any waste that has not previously been burned in its incinerator? yes no N/A

If yes, did the analysis determine:

a. Heating value of the waste? yes no

b. Halogen and sulfer content of the waste? yes no

c. Concentrations of lead and mercury in the waste? yes no

If no, can the facility document that these elements are not present? yes no

265.345

4. During start-up and shut-down, is the incinerator operating at steady state conditions whenever hazardous waste is fed? yes no

265.347

5. Are monitoring/inspections performed when incinerating hazardous waste? yes no

If yes, do they include:

a. Monitoring of existing instruments which relate to combustion and emission control at least every 15 minutes? yes no

b. Inspections of complete incinerator and associated equipment at least daily for leaks, spills, and fugitive emissions? yes no

265.351

6. Has the facility closed any of its incinerators? yes no

If yes, have all hazardous waste and hazardous waste residues been removed? yes no

265.352

7. Does the facility burn F020, F021, F022, F023, F026, or F027 waste? yes no

If yes, did the facility receive a proper certification from EPA indicating that it can meet the necessary performance standards when burning these wastes? yes no

XV. Thermal Treatment

1. Is the process a non-continuous (batch) process?
yes no

265.373
If no, is the process operating at steady state conditions (including temperature) before adding hazardous waste?
yes no

265.375
2. Does the facility have records to indicate that it analyzes any waste which had not previously been treated in the thermal process? yes no

If yes, did analyses include the following:

265.375(a)
a. Heating value? yes no

265.375(b)
b. Halogen content? yes no

c. Sulfer content? yes no

265.375(c)
d. Concentration of lead? yes no

e. Concentration of mercury? yes no

Note: d. and e. are not required if the facility has written documentation data that show the elements are not present.

3. Is this analytical data placed in the facility's operating record? yes no

265.377(a)(1)
4. Are the existing instruments which relate to temperature and emission control monitored at least every 15 minutes? yes no

If yes, are appropriate corrections to maintain steady state conditions made immediately, either automatically or by the operator? yes no

265.377(a)(2)
5. Is the stack plume (emissions) observed visually at least hourly for normal appearance (color and opacity)? yes no

If yes, are operating corrections made immediately to return any visible emissions to their appearance? yes no

265.377(a)(3)
6. Is the complete thermal treatment process and associated equipment (pumps, valves, conveyors, pipes, etc.) inspected at least daily for leaks, spills and fugitive emissions? yes no

7. Are all emergency shutdown controls and system alarms checked at least daily to assure proper operation? yes no

8. Have any of the facility's thermal treatment units undergone closure? yes no

265.381
If yes, were all hazardous waste and hazardous waste residues removed from the thermal treatment process/equipment? yes no

9. Is open burning of hazardous wastes conducted at this facility? yes no

265.382
If yes, is the open burning of hazardous waste restricted to waste explosives? yes no

If no, describe: _____

_____

_____

_____

10. Is open burning or detonation of waste explosives performed in accordance with the "minimum distance" requirements shown below? yes no N/A

Pounds of waste explosives or propellants	**Minimum distance from open burning or detonation to the property of others**
0 - 100	**204 m (670 feet)**
101 - 1,000	**380 m (1,250 feet)**
1,001 - 10,000	**530 m (1,730 feet)**
10,001 - 30,000	**690 m (2,260 feet)**

XVI. Chemical, Physical and Biological Treatment

Note: This section applies to the treatment of hazardous waste in units other than tanks, surface impoundments and land treatment facilities.

1. Does the treatment process and equipment exhibit any signs of excessive corrosion, deterioration or wear? yes no

If yes, describe: _____

_____

_____

_____

2. Are any of the treatment processes or equipment inoperative or do not appear to be operating properly? yes no

If yes, describe: _____

_____

_____

_____

3. Are there any leaks or other failures associated with any aspect of the facility's treatment system? yes no

If yes, describe: _____

_____

_____

_____

265.401(c)
4. Is there a means to stop waste inflow to the treatment process if the process is a continuous feed system?
yes no N/A

265.402(a)
5. If hazardous waste is to be treated which is substantially

different from any waste previously treated at the facility or a substantially different process than any previously used at the facility is used to treat the waste, does the facility:

a. Conduct waste analyses and trial treatment tests (e.g., bench scale or pilot plant scale) yes no

b. Obtain written, documented information on similar treatment of similar waste? yes no

265.403(a)(1)
6. Does the facility inspect, where present, discharge control and safety equipment at least daily? yes no

265.403(a)(2)
7. Does the facility inspect, where present, data gathered from monitoring equipment at least daily? yes no

265.403(a)(3)
8. Does the facility inspect the construction materials of the treatment process or equipment at least weekly? yes no

265.403(a)(4)
9. Does the facility inspect the construction materials of, and the area immediately surrounding, discharge confinement structures at least weekly? yes no

10. Have any of the facility's treatment processes undergone closure? yes no

265.404
If yes, was all hazardous waste and hazardous waste residues removed from the treatment processes or equipment?
yes no

11. Are ignitable or reactive wastes placed in the treatment process? yes no

If yes:

265.405(a)(1)
a. Is the waste treated, rendered or mixed before or immediately after placement in the treatment process so it no longer meets the definition of ignitable or reactive? yes no

b. 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: _____

_____

_____

265.405(a)(2)
c. Is the waste protected from sources of ignition or reaction? yes no

12. Are incompatible wastes placed in the same treatment process or equipment? yes no

If yes:

265.406(a)
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: _____

_____

_____

_____

XVII. Containment Buildings

265.1101(a)(1) & (2)

1. 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)

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

If yes, describe: _____

_____

_____

265.1101(a)(4)

3. Does the containment building(s) have a primary barrier that appears to be sufficiently durable and effective? yes no

If no, describe: _____

_____

_____

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

If no, skip to question 7:

265.1101(b)(2)

5. 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)
6. 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: _____

_____

_____

7. 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)
8. Is the primary barrier free of significant cracks, gaps, corrosion or other deterioration/openings? yes no

265.1101(c)(1)(ii)
9. Is the hazardous waste stored at a height that exceeds the height of any containment wall? yes no

265.1101(c)(1)(iii)
10. Is any hazardous waste tracked outside of the containment building by personnel or equipment? yes no

265.1101(c)(1)(iv)
11. Are any fugitive emissions exiting the containment building via doors, windows, cracks, vents, etc? yes no

265.1101(c)(2)
12. Does the facility have a certification for the containment building by a qualified registered professional engineer? yes no

13. 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)
14. 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: _____

_____

_____

_____

Additional Comments:

_____

_____

_____

_____

_____

_____

_____

_____