WASTE MANAGEMENT & RADIATION CONTROL

Site **EPA ID:** **Date:**

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Waste Determination: Has the generator determined whether his solid waste is a hazardous waste?	R315-262-11 R315-261-3	-
Has a waste determination been made for each waste stream?		-
Does the generator have documentation that supports the determinations?	R315-262-11(f)	-
Notification & EPA Hazardous Waste Identification Numbers Has the generator notified of regulated activity and obtained an EPA ID#?	R315-262-18(a)	-
Has the generator offered his hazardous waste to a transporter or a treatment, storage, or disposal facility (TSDF) that does not have an EPA ID#?	R315-262-18(c)	-
Does the generator know he must renotify every 4 years?	R315-262-18(d)(1)	-
Manifest Has the generator used the approved manifest form 8700-22 and 8700-22A for off-site transportation to a TSDF?	R315-262-20(a)	-
Have all applicable sections of each manifest been filled out completely and legibly? (See attached manifest checklist)		-
Does the facility generate less than 1000 kg/month and use a contractual agreement to reclaim his waste?	R315-262-20(e)(1)	-
Have copies of the reclamation agreements been kept on file for at least three years after termination of the agreement?	R315-262-20(e)(2)	-
Record Keeping Is the generator maintaining signed copies of the manifests for three years?	R315-262-40(a)	-
Is the generator maintaining records of test results or waste analyses for hazardous waste determinations for at least three years?	R315-262-40(c) R315-262-11(f)	-
Was the SQG a LQG for any month of the year?	R315-262-41(a)	-
Exception Reporting Has the generator been required to prepare an Exception Report (if the TSDF does not return the generator's original copy of the manifest within 60 days)? If yes, the generator must submit a legible copy of the manifest to the Director, with some indication that the confirmation of delivery to the TSDF has not been received.	R315-262-42(b)	-
Has the generator kept a copy of each Exception Report for at least threes years?	R315-262.40(b)	-

Inspector's Initials:_____

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Packaging, Labeling, Marking, and Placarding Are hazardous waste containers packaged, labeled, marked, and placarded in accordance with DOT 49 CFR prior to shipment?	R315-262-30, R315-262-31, R315-262-32, & R315-262-33	-
Accumulation Time 1. Has the generator stored hazardous wastes on-site for longer than 180 days or 270 days (if the wastes are transported over 200 miles to a TSDF) without a permit?	R315-262-16(b), R315-262-16(c), & R315-262-16(d)	-
2. Has the generator ever accumulated more than 6000 kg of hazardous waste on-site?	R315-262-16(b)(1)	-
3. The date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container of hazardous waste.	R315-262-16(b)(6)(i)(C)	☐
4. While being accumulated on-site each container and tank is labeled or marked clearly with the words, "Hazardous Waste" & an indication of the hazards of the contents.	R315-262-16(b)(6)(i)(A) & (B)	-
5. Does the facility have at least one person on the premises or on call (available to reach the facility in a short period of time) with the responsibility for coordinating all emergency response measures. This employee is the emergency coordinator.	R315-262-16(b)(9)(i)	-
6. Has the generator posted the following information next to the telephone: Name and phone number of emergency coordinator; Location of fire extinguishers, spill control material, and if present, fire alarm; and Telephone number of the fire department, unless the facility has a direct alarm.	R315-262-16(b)(9)(ii)(A-C)	-
Does the generator ensure that all employees are thoroughly familiar with the hazardous waste handling and emergency procedures relevant to their positions?	R315-262-16(b)(9)(iii)	-
Will the Emergency Coordinator or his designee be available to respond to any emergencies that arise.	R315-262-16(b)(9)(iv)(A-C)	-
Use and Management of Containers Are hazardous waste containers in good condition?	R315-262-16(b)(2)(i) R315-265-1, 40CFR265.171	-

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Are the containers compatible with the hazardous waste?	R315-262-16(b)(2)(ii) R315-265-1, 40CFR265.172	-
Are hazardous waste containers kept closed except when adding or removing waste.	R315-262-16(b)(2)(iii)(A) R315-265-1, 40CFR265.173(a)	-
Containers must not be opened, stored or handled in a way that may cause them to rupture or leak hazardous waste.	R315-262-16(b)(2)(iii)(B) R315-265-1, 40CFR265.173(b)	☐
Hazardous waste containers must be inspected weekly looking for unlabeled, leaking and deteriorated containers.	R315-262-16(b)(2)(iv) R315-265-1, 40CFR265.174	☐
Are incompatible wastes stored in the same containers?	R315-262-16(b)(v)(A) R315-265-1, 40CFR265.177(a)	-
Are hazardous wastes placed in containers that previously held an incompatible waste?	R315-262-16(b)(2)(v)(B) R315-265-1, 40CFR265.177(b)	-
Are hazardous wastes separated from incompatible wastes by means of a dike, berm, wall, or other device?	R315-262-16(b)(2)(v) (C) R315-265-1, 40CFR265.177(c)	-
Preparedness and Prevention		
Is the facility maintained and operated in a way to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste.	R315-262-16(b)(8)(i) R315-265-1, 40CFR265.31	-
Does the facility have the following equipment unless the wastes stored do not pose the hazards that the equipment is designed to respond to: internal communications or alarm capable of providing immediate emergency instructions (voice or signal) to facility personnel, a device capable of summoning outside emergency assistance (such as a telephone or a direct line to the fire department), portable fire extinguishers, fire control equipment, spill control equipment, decontamination equipment, water at adequate pressure and volume to supply fire fighting needs.	R315-262-16(b)(8)(ii) R315-265-1, 40CFR265.32	-
Does the facility maintain and test, where necessary, all communications or alarm systems; fire protection equipment, spill control equipment, and decontamination equipment to assure proper operation when needed.	R315-262-16(b)(8)(iii) R315-265-1, 40CFR265.33	-

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Do facility personnel have immediate access to an alarm or emergency communication device whenever hazardous waste is handled and if there is ever just one employee on the premises during facility operation, does he have immediate access to a device (telephone or two-way radio) capable of summoning external emergency assistance?	R315-262-16(b)(8)(iv) R315-265-1, 40CFR265.34	-
Does the facility maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?	R315-262-16(b)(8)(v) R315-265-1, 40CFR265.35	-
Has the facility attempted to make arrangements with local fire, police, emergency response teams, and hospitals to respond to emergency situations? The facility must document any refusal to enter into such arrangements.	R315-262-16(b)(8)(vi) R315-265-1, 40CFR265.37	-
Spill Response		
Does the facility take appropriate action to minimize threats to human health and the environment by notifying the Utah Department of Environmental Quality at (801) 536-4123 if more than 1 kg of acutely hazardous waste, 100 kg of hazardous waste or material which when spilled becomes a hazardous waste? Are spills cleaned up as required?	R315-262-16(b)(9)(iv) R315-263-30	- -
Notify and report to the National Response Center, at 800-424-8802, if required.	R315-262-16(b)(9)(iv)(C) R315-263-30	-
Has the facility provided written reports including all information required by the rules to the Director within 15 days after any spill of hazardous waste or material which becomes a hazardous waste when spilled?	R315-263-33 R315-265-1, 40CFR265.56(i)	-
Land Disposal Restrictions (LDR)		
Is the facility managing and treating hazardous waste to meet Land Disposal Restriction standards found at 268.40?	R315-262-16(b)(7) R315-268	-
If the generator is treating waste to meet LDR has he developed and followed a written waste analysis plan which describes the procedures they will carry out to comply with the treatment standards? The waste analysis plan must be based on a chemical and physical analysis of a representative sample of the waste being treated.	R315-262-16(b)(7) R315-268-7(a)(5)	-
Is the plan available on-site in the facility files?	R315-268-7(a)(5)(ii)	-

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Has the facility sent a one-time notice and certification that each hazardous waste is either not land disposal restricted, or if it is restricted, that it is land disposable after treatment with each initial manifested shipment of hazardous waste or when the waste stream changes?	R315-268-1 R315-268-7(a)(2) R315-268-7(a)(3)	-
Does the facility maintain an assessment of LDR status on file for each hazardous waste generated at the facility?	R315-268-1 R315-268-7(a)(1)	-
Does the facility maintain all LDR documentation for at least three years from the date the hazardous waste was shipped off-site?	R315-268-1 R315-268-7(a)(8)	-
Standards for Universal Waste Management Are fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium or metal halide lamps being managed as Universal Waste lamps?	R315-273-9(i) R315-273-5(a)	-
Are containers of universal waste lamps kept closed and labeled “Universal Waste Lamps”, “Waste Lamps”, or “Used Lamps”?	R315-273-13(d)(1) & R315-273-14(e)	-
Are lamps being crushed? Has the generator obtained from the Director an approved registration? Use Universal Waste Checklist if needed.	R315-273-13(d)(3)	-
Are rechargeable batteries being managed as a Universal Waste, kept in a closed container labeled “Universal Waste Batteries”, "Waste Batteries" or "Used Batteries"?	R315-273-13(a)(1) & R315-273-14(a)	-
Are aerosol cans being managed as a universal waste? Use Universal Waste Checklist if needed.	R315-273-13(f)	-
Is antifreeze being managed as an universal waste? Use Universal Waste Checklist if needed.	R315-273-13(e)	-
Is any Universal Waste being accumulated for longer than one year?	R315-273-15(a)	-

Inspector’s Initials:_____

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	**CITATION**	**COMMENTS**		
Manifest Number (box)	#	#	#	#
Generator EPA ID # **R315-5-2 (box 1**				
Generator information: **Mailing Address (box 5)** **Phone number**				
Transporter #1 information: **Company Name (box 6)** **EPA ID# (box 6)**				
Transporter #2 information: **Company Name (box 7)** **EPA ID # (box 7)**				
Designated Facility information: **Name and Address (box 8)** **EPA ID # (box 8)** **Phone Number (box 8)**				
Waste shipping requirements: **DOT Description (including proper name, Hazard class and ID#) (box 9b)** **(box 9a "X" if hazardous materials)** **Containers: No & Type (box 10)** **Total Quantity (box 11)** **Unit – Wt/Vol (box 12)** **Waste Codes (box 13)**				
Special Handling Instructions (box 14)				
Manifest Certifications: **Generator's Signature (box 15)** **International Shipments (box 16)** **Transporter's Signature (box 17)** **Discrepancy Indication (box 18)** **Hazardous Waste Report Management Method Codes (box 19)** **Facility Signature (box 20)**				
Final Observations and Comments:				

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Requirements for SQGs that Accumulate Hazardous Waste in Tanks		
1. A generator may accumulate hazardous waste in tanks for less that 180 days (or 270 days if the generator must ship the waste greater than 200 miles), and may not accumulate over 6,000 kg on-site at any time.	R315-262-16(b)(1) & (b)(3)	-
2. Treatment or storage of hazardous waste in tanks must not generate extreme heat or pressure, fire or explosion, or violent reaction; produce toxic mists, fumes, dusts, or gases; produce uncontrolled flammable fumes or gases; damage the device or facility containing the waste; or threaten human health or the environment.	R315-262-16(b)(3)(ii)(A) R315-265-1, 40CFR265.199(a)	-
3. Hazardous waste or treatment reagents must not be placed in a tank if it could cause it to fail.	R315-262-16(b)(3)(ii)(B) R315-265-1, 40CFR265.194(a)	-
4. Uncovered tanks must have 2 feet of freeboard, unless the tank has a containment structure that equals or exceeds the volume of the top 2 feet of the tank.	R315-262-16(b)(3)(ii)(C) R315-265-1, 40CFR265.194(b)(3)	-
5. If hazardous waste is continuously fed into a tank, the tank must be equipped to the inflow (waste feed cutoff or by-pass system to stand-by tank).	R315-262-16(b)(3)(ii)(D) R315-265-1, 40CFR265.194(b)(2)	-
Small Quantity Generators that store hazardous waste in tanks must inspect, where present:	R315-262-16(b)(3)(iii) R315-265-1, 40CFR265.195(a)	
1. Discharge control equipment at least once each operating day to ensure good working order.	R315-262-16(b)(3)(iii)(A) R315-265-1, 40CFR265.195(b)(1)	-
2. Data from monitoring equipment at least once each operating day to ensure that the tank is operated to its designs.	R315-262-16(b)(3)(iii)(B) R315-265-1, 40CFR265.195(a)	-
3. The level of the waste in the tank at least once each operating day to ensure compliance with freeboard, if required.	R315-262-16(b)(3)(iii)(C) R315-265-1, 40CFR265.195(b)(2)	-
4. The tank construction materials, at least weekly, to detect corrosion or leaking seams or fixtures.	R315-262-16(b)(3)(iii)(D) R315-265-1, 40CFR265.195(b)(3)	-
5. The construction and surrounding area of discharge confinement structures at least weekly to detect erosion or signs of leakage.	R315-262-16(b)(3)(iii)(E) R315-265-1, 40CFR265.195(b)(3)	-

Hazardous Waste Inspection – Small Quantity Generator Checklist

NOTES: