



Site: _____ EPA #: _____ Date: _____

Hazardous Secondary Materials (HSM) Generator Inspection Checklist

INSPECTION ITEM	CITATION	COMMENTS
<p>Generator-controlled reclamation</p> <p>Reclamation of HSM must meet one of the following:</p> <p>____ Generated and reclaimed at the generator's facility</p> <p>____ Generated and reclaimed by the same person (company)</p> <p>____ Generated under a written contract with a tolling contractor, who performs the reclamation</p>	<p>R315-261-4(a)(23)(i)(A)</p> <p>R315-261-4(a)(23)(i)(B)</p> <p>R315-261-4(a)(23)(i)(C)</p>	
<p>Has the generator performed a legitimacy determination (includes how the recycling meets and considers all factors in R315-260-43), and is this documentation on-site for at least 3 years after recycling of the HSM has ceased?</p>	<p>R315-261-4(a)(23)(ii)(E)</p>	
<p>Is the generator managing the HSM to meet the definition of it being contained?</p> <p>Are leaks or other unpermitted releases being immediately recovered for the purpose of reclamation, or being treated as solid wastes?</p>	<p>R315-261-4(a)(23)(ii)(A)</p> <p>R315-260-10(c)(19)</p> <p>R315-261-4(a)(23)(ii)(A)</p>	
<p>Is the generator storing the HSM in a unit, such that it can be demonstrated that speculative accumulation is not occurring? (label indicating when accumulation started, or through inventory logs or other appropriate methods)</p>	<p>R315-261-4(a)(23)(ii)(B)</p> <p>R315-261-1(c)(8)</p>	
<p>If applicable, does the generator have records documenting that the HSM is being reclaimed within its company or has a toll manufacturing reclamation agreement ?</p> <p>Did the generator provide notification (EPA form 8700-12) of this HSM recycling activity?</p>	<p>R315-261-4(a)(23)(i)(B)</p> <p>R315-261-4(a)(23)(i)(C)</p> <p>R315-261-4(a)(23)(ii)(C)</p> <p>R315-260-42</p>	
<p>Does the generator have emergency preparedness and response conditions in their plans to address HSM? <i>Note: See "Preparedness and Prevention Checklist" and appropriate Emergency Procedures Checklist</i></p>	<p>R315-261-4(a)(23)(ii)(F)</p>	
<p>If the HSM is sent to a same-company offsite facility, or managed under a tolling agreement, does the generator have at least 3 years of records that include transporter name, shipment date, type and quantity of HSM shipped?</p>	<p>R315-261-4(a)(23)(i)(B)</p> <p>R315-261-4(a)(23)(i)(C)</p>	



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<p>HSM shipped to Other Persons for Reclamation R315-216-4(a)24, 25</p> <p>Is the generator storing the HSM in a unit, such that it can be demonstrated that speculative accumulation is not occurring? (label indicating when accumulation started, or through inventory logs or other appropriate methods)</p> <p>Is the HSM being managed so that no other person or facility handles it, except the generator, transporter, and reclamation facility?</p> <p>The HSM being managed must not be otherwise subject to R315-261-4(a) material-specific management conditions, and must not be a spent lead-acid battery</p> <p>Reclamation of the HSM must be legitimate, based upon the criteria in R315-260-43</p>	<p>R315-261-4(a)(24)(i) R315-261-1(c)(8)</p> <p>R315-261-4(a)(24)(ii)</p> <p>R315-261-4(a)(24)(iii)</p> <p>R315-261-4(a)(24)(iv) R315-260-43(a)</p>	
<p>Is the generator managing the HSM to meet the definition of it being contained?</p> <p>Are leaks or other unpermitted releases being immediately recovered for the purpose of reclamation, or being treated as solid wastes?</p> <p>Is the generator shipping the HSM to a reclamation facility where management of the HSM is addressed under a Part B permit? If yes, the next section may be skipped. If no, the next section is required.</p>	<p>R315-261-4(a)(24)(v)(A) R315-260-10(c)(19)</p> <p>R315-261-4(a)(24)(v)(A)</p> <p>R315-261-4(a)(24)(v)(B)</p>	
<p>Reclamation activity not addressed under a RCRA Part B Permit by a receiving facility <i>(skip this section if the reclamation activity at the receiving facility is covered under a RCRA Part B Permit)</i></p> <p>Before arranging for transport of HSM to a reclamation facility, where reclamation of the HSM is not covered under a Part B permit, the generator must make reasonable efforts to ensure that each reclaimer or intermediate facility intends to properly and legitimately reclaim the HSM, and not discard it, and each manages the HSM in a manner protective of human health and the environment,.</p> <p>The generator satisfies this by assessing the questions from R315-261-4(a)(24)(v)(B) at least every 3 years:</p> <ul style="list-style-type: none"> • Does available information indicate the reclamation process is legitimate? • Does available information indicate that the reclaimer and any intermediate facilities have notified of HSM activity, per R315-260-42, including having financial assurance, per R315-260-42(a)(5)? 	<p>R315-261-4(a)(24)(v)(B)</p> <p>R315-261-4(a)(24)(v)(B)(I)</p> <p>R315-261-4(a)(24)(v)(B)(II)</p>	

<p>Reclamation activity not addressed under a RCRA Part B Permit by a receiving facility (continued)</p> <ul style="list-style-type: none"> • Do the reclaimer and any intermediate facilities have formal enforcement actions taken against their facilities within the last 3 years? • Does available information indicate that the reclaimer and any intermediate facility have the appropriate equipment and trained personnel to properly manage the HSM? • If the reclamation facility generates residuals, does it have a permit to manage those residuals, or does it properly manage them for offsite disposal at a Part B facility? If neither of these apply, does the reclaimer have credible evidence that the residuals are being managed in a manner protective of human health and the environment? 	<p>R315-261-4(a)(24)(v)(B)(III)</p> <p>R315-261-4(a)(24)(v)(B)(IV)</p> <p>R315-261-4(a)(24)(v)(B)(V)</p>	
<p>Does the generator have at least 3 years of records for off-site shipments, that includes name of transporter, date of shipment, name and address of the reclaimer, and type and quantity of the HSM that was shipped?</p> <p>Does the generator have at least 3 years of records for off-site shipments, that confirms receipt of the HSM by the reclaimer? (Note: financial records, bills of lading, copies of D.O.T. shipping papers, or electronic receipts satisfy this requirement)</p>	<p>R315-261-4(a)(24)(v)(C)</p> <p>R315-261-4(a)(24)(v)(D)</p>	
<p>Does the generator have emergency preparedness and response conditions in their plans to address HSM? <i>Note: See "Preparedness and Prevention Checklist" and appropriate Emergency Procedures Checklist</i></p>	<p>R315-261-4(a)(24)(v)(E)</p>	



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<p style="text-align: center;">Remanufacturing Exclusion</p> <p>Does the HSM that is generated and transferred to another person for remanufacture consist of <u>one</u> or <u>more</u> of the following <u>spent</u> solvents?:</p> <p>Toluene, xylenes, ethylbenzene, 1,2,4-trimethylbenzene, chlorobenzene, n-hexane, cyclohexane, methyl tert-butylether, acetonitrile, chloroform, chloromethane, dichloromethane, methyl isobutyl ketone, NN-dimethylformamide, tetrahydrofuran, n-butyl alcohol, ethanol and/or methanol</p> <p>Is the HSM originating from using one or more of the above spent solvents (commercial grade) that was used for reacting, extracting, purifying, or blending chemicals, or rinsing out process lines, in one of the following sectors?:</p> <p>(Sector / NAICS Code) Pharmaceutical manufacturing / 325412, Basic organic chemical manufacturing / 325199, Plastics and resins manufacturing / 325211 and/or Paints and coatings manufacturing / 325510.</p> <p>Is the HSM generator sending the material to a remanufacturer in one of the same sector/NAICS codes above? (Required for use of this exclusion)</p>	<p>R315-261-4(a)(27)(i)</p> <p>R315-261-4(a)(27)(ii)</p> <p>R315-261-4(a)(27)(ii)</p> <p>R315-261-4(a)(27)(iii)</p>	
<p>After remanufacturing of the solvent(s), is the remanufactured solvent being used <u>only</u> for reacting, extracting, purifying, or blending chemicals, or for rinsing out the process lines associated with these functions, or being used as ingredients in a product, in one of the four sectors/NAICS codes shown above?</p> <p>The following reuses are NOT allowed: cleaning or degreasing oil, grease, or similar material from textiles, glassware, metal surfaces, or other articles?</p>	<p>R315-261-4(a)(27)(iv)</p> <p>R315-261-4(a)(27)(v)</p>	
<p>Generator and the remanufacturer must:</p> <ul style="list-style-type: none"> -Notify of the activity, and update every two years -Develop and maintain a remanufacturing plan -Maintain records of shipments and confirmations of receipts for at least 3 years from the dates of shipments -Store the spent solvents in containers or tanks that meet R315-261-170 to 179 (containers), and R315-261-190 to 200 (tanks) standards, and ensure that proper air emission controls are maintained on equipment -Ensures that speculative accumulation is avoided, and can demonstrate it is avoided 	<p>R315-261-4(a)(27)(vi)(A)</p> <p>R315-261-4(a)(27)(vi)(B)</p> <p>R315-261-4(a)(27)(vi)(C)</p> <p>R315-261-4(a)(27)(vi)(D)</p> <p>R315-261-4(a)(27)(vi)(E)</p> <p>R315-261-4(a)(27)(vi)(F)</p>	



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<p style="text-align: center;">Generator operating under existing approved exclusion or non-waste determination</p> <p>Did the generator apply to the Director, and receive approval for the claimed exclusion, reclassification, or non-waste determination?</p> <p>If there has been a change in circumstances effecting how the HSM meets the relevant criteria that were the basis for the past approval by the Director, did the generator send information about the change in circumstances to the Director for reassessment of the approval?</p> <p>Is the generator reapplying for the exclusion/non-waste determination at least six months prior to the end of the approval term? (Note: exclusion and non-waste determinations are good for a period of no more than 10 years)</p> <p>Has the generator provided notification (EPA Form 8700-12) under R315-260-42 for the granted exclusion?</p>	<p>R315-260-33(a)</p> <p>R315-260-33(c)</p> <p>R315-260-33(d)</p> <p>R315-260-33(e)</p>	