



WASTE MANAGEMENT  
& RADIATION CONTROL

Site:

EPA ID:

Date:

**Hazardous Waste Inspection**  
**Universal Waste**  
**Small Quantity Handler (less than 5,000 kg)**

INSPECTION ITEM	REGULATORY CITATION	COMMENTS
Does the facility manage any of the following universal waste streams: 1. Batteries? 2. Pesticides? 3. Mercury Containing Equipment? 4a. Lamps? 4b. Drum-Top Crusher? 5. Antifreeze? 6. Aerosol Cans? 7. Household and Conditionally Exempt Small Quantity Generator Waste?	R315-273-2 and R315-273-13(a) R315-273-3 and R315-273-13(b) R315-273-4 and R315-273-13(c) R315-273-5, R315-273-13(d) & (d)(3) R315-273-6(a) and R315-273-13(e) R315-273-6(b) and R315-273-13(f) R315-273-8	
Did the handler dispose of, dilute or treat any waste?	R315-273-11	
Are waste batteries managed to prevent releases? Are waste batteries that are leaking, spilling or damaged placed in a container?	R315-273-13(a) R315-273-13(a)(1)	
Has the handler determined if any electrolyte or other solid waste removed from waste batteries exhibits a characteristic of hazardous waste? Is the electrolyte or other solid waste being managed properly?	R315-273-13(a)(3) R315-273-13(a)(3)(i) and (ii)	
Are waste pesticides managed to prevent releases by being properly containerized?	R315-273-13(b)	
Is waste mercury containing equipment managed to prevent releases by being properly containerized?	R315-273-13(c)(1)	
Does the handler properly remove and manage mercury containing ampules?	R315-273-13(c)(2)(i) – (ii)	
Does the handler have equipment, systems and procedures in place for handling spills or leaks of mercury? Are employees who remove ampules properly trained in mercury handling and emergency procedures?	R315-273-13(c)(2)(iii) – (v) R315-273-13(c)(2)(vi)	
Does the handler properly pack and store removed ampules?	R315-273-13(c)(2)(vii) – (viii)	
Does the handler properly manage waste mercury-containing equipment that does not contain an ampule?	R315-273-13(c)(3)	
Has the handler determined if any mercury, clean-up residues or other solid waste generated from removal of mercury containing ampules exhibits a characteristic of hazardous waste? Is the waste being managed properly?	R315-273-13(c)(4) R315-273-13(c)(4)(ii) – (iii)	
Are waste lamps managed to prevent releases by being properly containerized?	R315-273-13(d)	
If the handler performs crushing of universal waste lamps, is it properly managing the drum-top crusher? Did the handler apply and receive approval for the drum-top crusher?	R315-273-13(d)(3)	

INSPECTION ITEM	REGULATORY CITATION	COMMENTS
Are waste batteries or containers labeled "Universal Waste Battery" or "Waste Batteries" or "Used Batteries"?	R315-273-14(a)	
Are containers, tanks or vessels of recalled waste pesticides labeled with the label that was on or accompanied the product and "Universal Waste Pesticide" or "Waste Pesticides"?	R315-273-14(b)	
Are containers, tanks or vessels of unused pesticide products labeled with the label that was on the product or required DOT label or label prescribed by a waste pesticide collection program and "Universal Waste Pesticide" or "Universal Waste Pesticides"?	R315-273-14(c)(1) – (2)	
Are waste mercury containing devices or containers labeled, "Universal Waste Mercury Containing Equipment", Waste Mercury Containing Equipment" or "Used Mercury Containing Equipment"?	R315-273-14(d)(1)	
Are waste mercury containing thermostats or containers labeled, "Universal Waste Mercury Thermostat(s)", "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"?	R315-273-14(d)(2)	
Are each waste lamp, container or package labeled, "Universal Waste Lamp(s)", Waste Lamp(s)" or "Used Lamp(s)"?	R315-273-14(e)	
Are waste antifreeze containers, tanks or transport vessels labeled, "Universal Waste Antifreeze" or Waste Antifreeze"?	R315-273-14(f)	
Are waste aerosol cans or containers of cans labeled, "Universal Waste Aerosol Can(s)" or "Waste Aerosol Can(s)"?	R315-273-14(g)	
Can the handler demonstrate the length of time the waste has been accumulated? Is the period longer than one year? If longer than one year can the handler prove that the purpose is to accumulate quantities as necessary to facilitate proper recovery, treatment or disposal?	R315-273-15(c) R315-273-15(a) R315-273-15(b)	
Has the handler provided employees who handle or manage universal waste with proper handling and emergency response procedures?	R315-273-16	
Has the handler properly contained and managed all releases of waste and residues from waste?	R315-273-17	
Did the handler send universal waste to any facility other than a universal waste handler, destination facility or foreign destination? Did the handler transport the waste? If so, see check list for Universal Waste Transporters. Did the handler properly package, label, mark and placard the waste and prepare proper shipping documents?	R315-273-18(a) R315-273-18(b) R315-273-18(c)	
Did the handler have any shipments of waste rejected by receiving facilities? Did the handler reject any shipments of waste?	R315-273-18(e) R315-273-18(f)	
Did the handler receive any shipments that contained hazardous waste? If so, was the Director immediately notified?	R315-273-18(g)	
Did the handler export any waste?	R315-273-20	

Inspector's Initials