

Site: _____

EPA #: _____

Date: _____

**Hazardous Waste Inspection
Drum Top Lamp Crusher**

Small Quantity Handler (Less than 5000 kg) Large Quantity Handler (5,000 kg or more)

INSPECTION ITEM	REGULATORY CITATION	COMMENTS
Has the handler submitted a registration application to the Director? Has the handler received approval from the Director? If no, explain.	R315-273-13(d)(3) R315-273-33(d)(3)	
Are the lamps crushed in a closed container?	R315-273-13(d)(3)(i) R315-273-33(d)(3)(i)	
Are the lamps crushed in a controlled manner that prevents release of mercury or other contaminants?	R315-273-13(d)(3)(ii) R315-273-33(d)(3)(ii)	
Does the crusher consist of, at a minimum, a bag filter in series with a HEPA filter and an activated carbon filter?	R315-273-13(d)(3)(iii) R315-273-33(d)(3)(iii)	
Is the crusher installed, maintained and operated in accordance with written manufacturer's instructions? Do the instructions include the frequency of filter changes?	R315-273-13(d)(3)(iv) R315-273-33(d)(3)(iv)	
Are the filters managed as a hazardous waste? If not, has the handler characterized the filters to demonstrate they are not hazardous?	R315-273-13(d)(3)(v) R315-273-33(d)(3)(v)	
Is there a spill clean-up kit available?	R315-273-13(d)(3)(vi) R315-273-33(d)(3)(vi)	
Is the drum crusher operated in a well ventilated area that is monitored to ensure compliance with OSHA exposure levels?	R315-273-13(d)(3)(vii) R315-273-33(d)(3)(vii)	
Are employees trained annually on operation, safety, personal protection, maintenance and emergency procedures?	R315-273-13(d)(3)(viii) and (ix) R315-273-33(d)(3)(viii) and (ix)	
Is an operating record being kept? Does it consist of the following: Number and size of lamps crushed per calendar year? Schedule for change out of filters? Date and time of filter change out? Date, time and type of maintenance? Occurrence of any malfunctions? Procedures for preventing malfunctions?	R315-273-13(d)(3)(x) R315-273-33(d)(3)(x) R315-273-13(d)(3)(x)(A) R315-273-33(d)(3)(x)(A) R315-273-13(d)(3)(x)(B) R315-273-33(d)(3)(x)(B) R315-273-13(d)(3)(x)(C) R315-273-33(d)(3)(x)(C) R315-273-13(d)(3)(x)(D) R315-273-33(d)(3)(x)(D) R315-273-13(d)(3)(x)(E) R315-273-33(d)(3)(x)(E) R315-273-13(d)(3)(x)(F) R315-273-33(d)(3)(x)(F)	
Is the operating record being maintained for at least three years?	R315-273-13(d)(4) R315-273-33(d)(4)	

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Has the crusher been removed or relocated? If yes, was the area decontaminated and a report submitted to the Director within 30 days following decontamination?	R315-273-13(d)(5) R315-273-33(d)(5)	
Does the handler have a closure plan and has it been provided to the Director? Does the plan contain a detailed estimate of the cost of disposing of the crusher, decontamination of the area and analytical costs?	R315-273-13(d)(6) R315-273-33(d)(6)	
Has the handler demonstrated financial assurance for the detailed cost estimate using one of the options in R315-261-143(a) through (e)?	R315-273-13(d)(7) R315-273-33(d)(7)	
Are crushed lamps being managed as universal waste or as hazardous waste?	R315-273-13(d)(8) R315-273-33(d)(8)	