



WASTE MANAGEMENT  
& RADIATION CONTROL

Site: \_\_\_\_\_ EPA #: \_\_\_\_\_ Date: \_\_\_\_\_

## Pre-Inspection for Verified Reclamation Facility Checklist

INSPECTION ITEM	CITATION	COMMENTS
<p>Can the facility demonstrate that the reclamation process for the HSM is legitimate, per the criteria in R315-260-43?:</p> <p><i>Note: See "Legitimate HSM Recycling Criteria Checklist" for criteria assessment</i></p>	R315-260-31(d)(1)	
<p>Has the facility NOT been subject to a formal enforcement action in the prior three years, and NOT been classified as a significant non-complier?</p> <p style="text-align: center;"><b>OR</b></p> <p>Can the facility provide credible evidence that it will manage the HSM properly? <i>(May include demonstrating the the facility has taken remedial steps to address violations, or that the prior violations were NOT relevant to proper management of the HSM)</i></p>	R315-260-31(d)(3)	
<p>Does the facility have adequate equipment and trained personnel to safely manage the HSM?</p> <p>Does the facility meet emergency preparedness and response requirements in R315-261-400 thru 420?</p> <p><i>Note: See the "Preparedness and Prevention Checklist" and appropriate Emergency Procedures Checklist (For HSM accumulated &lt;6,000 Kg, use the "SQG Emergency Procedures Checklist" (For HSM accumulated &gt;6,000 Kg, use the "Contingency Plant and Emergency Procedures Checklist")</i></p>	<p>R315-260-31(d)(4)</p> <p>R315-260-31(d)(4)</p> <p>See Supplemental Checklist based upon whether the facility will accumulate &lt;6,000 Kg of HSM, or &gt;6,000 Kg of HSM</p>	
<p>If residuals are generated from reclamation of the HSM, does the facility have permits (if required) to manage them, or have a contract with an appropriately permitted facility to manage them, or is able to present credible evidence that the residuals will be managed in a manner that is protective of human health and the environment?</p>	R315-260-31(d)(5)	
<p>Has the facility addressed the potential for risk to surrounding areas of unpermitted releases of HSM to the environment? <i>(May include, but not limited to: releases through surface transport by precipitation runoff, releases to soil and groundwater, wind-blown dust, fugitive air emissions, and catastrophic unit failures)</i> This must include consideration of potential cumulative risks from other nearby stressors.</p>	R315-260-31(d)(6)	

*This upfront requirement to be "verified" allows EPA and the states to verify that a facility has established rigorous safety measures to manage the material.*

- Under the variance process, EPA and the states will also be able to review and approve the facilities' financial assurance plans before operations begin to ensure that they are financially stable and that there will be funds available should the unexpected happen.
- Exports no longer allowed under the verified recycler exclusion.



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<p>Is the facility 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 verified reclamation facilities?</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>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>Does the facility have at least 3 years of records for shipments of HSM received, (<i>and, if applicable, sent off-site for further reclamation</i>) that includes name of transporter, date of shipment, name and address of the generator (<i>and, if applicable, the intermediate facility received from</i>), and type and quantity of the HSM that was shipped? (<i>If sent off-site for further reclamation, also the name and address of the subsequent facility</i>)</p> <p>If the facility is an intermediate, does it send the HSM to the reclaimer(s) designated by the generator?</p> <p>Is the facility sending confirmation records to the generator, for received shipments from the generator, that confirm 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>Is the facility sending managing the HSM in a manner that is at least as protective as that employed for analogous raw material, and is it contained?</p> <p>Are any residuals generated from reclamation processes being managed in a manner that is protective of human health and the environment, and, if they exhibit a hazardous characteristic, or are a listed hazardous waste, are they being managed appropriately?</p> <p>Does the facility have a hazardous waste Part B permit or interim status standards that addresses the management of the HSM, or has it/will it apply for, an exclusion under R315-260-31(d)?</p> <p>Has the facility provided notification that it is performing reclamation of the HSM? (EPA Form 8700-12)</p>	<p>R315-261-4(a)(24)(vi)(A)</p> <p>R315-261-4(a)(24)(vi)(B)</p> <p>R315-261-4(a)(24)(vi)(C)</p> <p>R315-261-4(a)(24)(vi)(D) R315-260-10(c)(19)</p> <p>R315-261-4(a)(24)(vi)(E)</p> <p>R315-261-4(a)(24)(vi)(G)</p> <p>R315-261-4(a)(24)(vii)</p>	



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<p>Does the facility have a detailed written estimate, in current dollars, of the cost of disposing of any HSM as listed or characteristic hazardous waste, and the potential cost of closing the facility as a TSDF?</p> <p>Is the facility adjusting the cost estimate annually, to account for inflation?</p> <p>Is the facility revising the cost estimate no later than 30 days after a change in the facility's operating plan or design that would increase the costs of disposal of the HSM as hazardous waste, or costs to close the facility as a TSDF?</p> <p>Does the facility have the most recent cost estimate (or revised cost estimate) available for review?</p> <p>Does the facility have the most recent adjusted estimate (inflation) available for review?</p>	<p>R315-261-4(a)(24)(vi)(F) R315-261-142(a)</p> <p>R315-261-4(a)(24)(vi)(F) R315-261-142(b)</p> <p>R315-261-4(a)(24)(vi)(F) R315-261-142(c)</p> <p>R315-261-4(a)(24)(vi)(F) R315-261-142(d)</p> <p>R315-261-4(a)(24)(vi)(F) R315-261-142(d)</p>	
<p>Does the facility have financial assurance for the current cost estimate through one of the below options?:</p> <p>___ <b>Trust fund</b> Has an originally signed duplicate of the trust agreement been provided to the Director?</p> <p>___ <b>Surety bond guaranteeing payment into a trust fund</b> Has the surety bond been submitted to the Director?</p> <p>___ <b>Letter of credit</b> Has the letter of credit been submitted to the Director?</p> <p>___ <b>Insurance</b> Has a certificate of insurance been submitted to the Director?</p> <p>___ <b>Financial test and corporate guarantee</b> Have the required signed letters and financial reports been submitted to the Director?</p> <p>___ <b>Multiple financial mechanisms</b> Has proof of financial assurance covering the current cost estimate by a combination of trust fund(s), surety bonds, letters of credit and insurance been submitted to the Director?</p>	<p>R315-261-143</p> <p>R315-261-143(a)</p> <p>R315-261-143(b)</p> <p>R315-261-143(c)</p> <p>R315-261-143(d)</p> <p>R315-261-143(e)</p> <p>R315-261-143(f)</p>	