

# — Container Inspections

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UTAH DEPARTMENT *of*  
ENVIRONMENTAL QUALITY  
**WASTE MANAGEMENT  
& RADIATION CONTROL**



# Requirements

- At least weekly, the SQG (or LQG) shall inspect central accumulation areas. The SQG (or LQG) shall look for leaking containers and for deterioration of containers caused by corrosion or other factors.
- If a container holding hazardous waste is not in good condition, or if it begins to leak, the SQG (LQG) shall immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the conditions for exemption.

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## Reference

**SQGs:** R315-262-

16(b)(2)(iv)

**LQGs:** R315-262-

17(a)(1)(v)



# What Should I be Looking For? ---

## MUST BE LOOKING FOR LEAKING AND DETERIORATING CONTAINERS

- Other good things to look for:
  - Correct labeling
    - R315-262-16(b) (6) and R315-262-17(a) (5)
  - Waste over accumulation time limit
    - R315-262-16(b) and R315-262-17(a)
  - Containers closed
    - R315-262-16(b) (2) (iii) and R315-262-17(a) (1) (iv)
  - Containers compatible with waste
    - R315-262-16(b) (2) (ii) and R315-262-17(a) (1) (iii)
  - Secondary containment under containers holding liquids
    - R315-262-16(b) (8) (i) and R315-262-251

# What Should I be Looking For? ---

## MUST BE LOOKING FOR LEAKING AND DETERIORATING CONTAINERS

- Other good things to look for (cont.):
  - Emergency equipment in the area
    - R315-262-16(b)(8)(ii) and R315-262-252
  - Sufficient aisle space
    - R315-262-16(b)(8)(v) and R315-262-255
  - Incompatible wastes separated
    - R315-262-16(b)(2)(v) and R315-262-17(a)(1)(vii)
  - Waste spilled on outside of containers or around containers
    - R315-262-16(b)(8)(i) and R315-262-251
  - General housekeeping
    - (i.e., debris in the area)



# How to Show Compliance

01

The generator gets to decide how they will prove compliance with these regulations

02

The most commonly used method to show compliance is a checklist

03

Examples of checklists used to show compliance can be found online

# Checklist Examples

| Weekly Hazardous Waste Inspection Checklist  |       |                   |                      |
|--|-------|-------------------|----------------------|
| Inspection Information   |       |                   |                      |
| Container or area being inspected (number/contents/location):  |       |                   |                      |
| Date and time:   |       |                   |                      |
| Date last inspected:   |       |                   |                      |
| Inspection completed by:   |       |                   |                      |
| Hazardous Waste  | Y / N | Corrective Action | Employee Responsible |
| Are containers properly and clearly labeled ("Hazardous Waste," the specific contents, and the collection date)? |       |                   |                      |
| Are containers tightly closed?   |       |                   |                      |
| Are wastes stored in compatible containers?  |       |                   |                      |
| Is there evidence of container deterioration?  |       |                   |                      |
| Are spaces between containers clear of debris?   |       |                   |                      |
| Are incompatible wastes properly segregated?   |       |                   |                      |
| Are there any signs of leaks or spills?  |       |                   |                      |
| Is spill response equipment adequate and accessible?   |       |                   |                      |
| Does each container have adequate secondary containment for its volume?  |       |                   |                      |
| If required, is an eyewash station accessible and ready for use?   |       |                   |                      |
| Are "Hazardous Waste" signs in place and clearly visible?  |       |                   |                      |
| Is a fire extinguisher in place and clearly visible?   |       |                   |                      |
| Are all waste containers stored inside the waste storage area?   |       |                   |                      |
| Is the total volume of wastes stored below the facility's generator status?                                      |       |                   |                      |
| Are flammable wastes properly stored and grounded/bonded?  |       |                   |                      |

| Inspection Information  |       |                   |                      |
|---|-------|-------------------|----------------------|
| Area Being Inspected:   |       |                   |                      |
| Date:   |       |                   |                      |
| Inspector (printed name & signature):   |       |                   |                      |
| Hazardous Waste Containers  | Y / N | Corrective Action | Employee Responsible |
| Are the containers properly dated?  |       |                   |                      |
| Are containers clearly marked or labeled an indication of the hazards of the contents?                                  |       |                   |                      |
| Are containers clearly marked or labeled "Hazardous Waste?"   |       |                   |                      |
| Are waste stored in compatible containers?  |       |                   |                      |
| Is there evidence of container deterioration?   |       |                   |                      |
| Is there adequate aisle spacing?  |       |                   |                      |
| Are incompatible wastes properly segregated?  |       |                   |                      |
| Are there any signs of leaks or spills?   |       |                   |                      |
| Are ignitable waste wastes properly stored & grounded/bonded?   |       |                   |                      |
| Are "No Smoking" signs in place & clearly visible?  |       |                   |                      |
| Are fire extinguishers in place and clearly visible?  |       |                   |                      |
| Is there decontamination equipment accessible? I.e. eyewash, shower   |       |                   |                      |
| Is spill response equipment adequate & accessible?  |       |                   |                      |
| Is there water at adequate volume & pressure?   |       |                   |                      |
| Is communication or warning device readily accessible?  |       |                   |                      |
| Is adequate emergency information posted?   |       |                   |                      |
| Is the total volume of waste stored below the facility's generator status?  |       |                   |                      |
| Are ignitable waste stored 50 feet from property line?  |       |                   |                      |
| Are all universal waste containers properly marked or labeled "Universal Waste" with an identification of the contents? |       |                   |                      |
| Are all universal waste containers properly closed?   |       |                   |                      |
| Are all universal waste containers marked with the accumulation start date?   |       |                   |                      |

# Other Best Practices

| Inspection Date | Inspector's initials. | Storage area free of spills and leaks. | Containers and storage area are properly labeled. | Containers are within secondary containers. | Fire extinguishers are serviced and tagged. | Labels are complete and visible. | Functional eyewash, safety showers, & ER equipment. | Containers are sealed with tight-fitting lids/hung. | Incompatibles are properly segregated. | Waste is not stored over allowable time. | Comments/Corrective Actions |
|-----------------|-----------------------|--|---|---|---|----------------------------------|---|---|--|--|-----------------------------|
| 5-13-21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 5-20-21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 5-27-21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 6-3-21          |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 6-10-21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 6-17-21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 6-24-21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 7-1-21          |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 7/8/21          |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 7/15/21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 7/22/21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 7/29/21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 8/5/21          |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 8/12/21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 8-19-21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 8-26-21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 9-2-21          |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 9-9-21          |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  | Corrected ripped label      |
| 9-16-21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |
| 9-23-21         |                       | ✓                                      | ✓   | ✓   | ✓   | ✓                                | ✓   | ✓   | ✓                                      | ✓  |                             |

Explain any problems found and corrective actions taken in the "Comments" section.  
This log is part of the facility operating records and must be kept for a minimum of three (3) years.

- Include date and time of inspection
- Include who performed inspection
- Note observations made
- Note any corrective actions taken
  - Noting these shows that you are actually inspecting and not just checking boxes
- Keep these records – we typically ask for three years' worth of container inspections when doing compliance evaluation inspections
- Be consistent – ideally no more than 6 days pass between inspections

**Date and Time:**  
5/16/23 at 10:00 am

**Inspector:**  
Jonathan Brown

| Hazardous Waste Container  | (Y/N) | Corrective action  |
|--|-------|--|
| Are there signs of leaking or deteriorating containers?              | Y     | Waste in rusting container transferred to new drum   |
| Are the containers properly and visibly labeled?                     | N     | Labels including "Hazardous Waste", an indication of the hazard, and accumulation start date added to all containers |
| Are containers closed?   | Y     |  |
| Is waste stored in compatible containers?                            | Y     |  |
| Is aisle space between containers sufficient to inspect containers?  | N     | Drums spaced out   |
| Is spill cleanup and fire suppression equipment present in the area? | Y     |  |
| Any waste over accumulation time limit?                              | ?     | Find out and ship off any waste over limit off   |



# Top 10 Issues Found During Inspections

1. Containers Open and Unlabeled
2. Training undocumented and/or applicable
3. Weekly inspections
4. Monthly generation counting
5. Attempt to make arrangement with local authorities
6. Contingency plan not current or missing elements
7. No quick reference guide
8. Manifest and LDR records incomplete
9. Emergency posting near phones or areas of waste generation/storage
10. Universal waste labeling and open containers



# Questions?



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Additional Questions? Contact Us!