

PROJECT	RCRA COMPLIANCE EVALUATION INSPECTION CHECKLIST
FACILITY	
ADDRESS	
CITY	
STATE	
RCRA ID#	
LEAD INSPECTOR	

CHECKLIST ROADMAP

CHECKLIST	APPLICABILITY	INCLUDED?
APPENDIX 1-1. DRIVE-BY	All	
APPENDIX 1-2. SITE ENTRY AND INBRIEFING	All	
APPENDIX 1-3. FACILITY BACKGROUND	All	
APPENDIX 1-4. GENERATOR WASTE STREAMS	All	
APPENDIX 1-5. OFF-SITE WASTE STREAMS	TSDFs	
APPENDIX 1-6. RECORDS REVIEW		
A. VERY SMALL QUANTITY GENERATOR (VSQG) REQUIREMENTS	VSQG	
B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS	SQG	
C. LARGE QUANTITY GENERATOR (LQG) REQUIREMENTS	LQG	
D. TREATMENT, STORAGE, AND DISPOSAL FACILITY (TSDF) REQUIREMENTS	TSDF	
APPENDIX 1-7. VISUAL REVIEW		
A. SATELLITE ACCUMULATION AREA(S)	SQG, LQG, TSDF (SAA)	
B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS		
1. Required Response Equipment and Hazard Management	SQG (all)	
2. Container Accumulation Area	SQG (Containers)	
3. Tank Accumulation Area(s)	SQG (Tanks)	
C. LARGE QUANTITY GENERATOR (LQG) REQUIREMENTS		
1. Required Response Equipment	LQG (all)	
2. Container Accumulation Area	LQG (Containers)	
3. Tank Accumulation Area(s)	LQG (Tanks)	
D. TREATMENT, STORAGE, AND DISPOSAL FACILITY (TSDF) REQUIREMENTS		
1. Required Response Equipment	TSDF (all)	
2. Container Accumulation Area	TSDF (Containers)	
3. Tank Accumulation Area(s)	TSDF (Tanks)	
E. USED OIL		
1. Prohibitions	Used Oil (all)	
2. Standards for Used Oil Generators and Used Oil Collection/Aggregation Points	Used Oil Generators, Used Oil Collection/Aggregation	
3. Standards for Used Oil Collection/Aggregation Points	Used Oil Collection/Aggregation	
F. UNIVERSAL WASTE (UW)		
1. General	SQH	
2. Universal Waste Lamps	SQH (lamps)	
3. Universal Waste Batteries	SQH (batteries)	
4. Universal Waste Mercury-Containing Equipment (MCE)	SQH (MCE)	
5. Universal Waste Pesticides	SQH (pesticides)	
APPENDIX 1-8. EXIT BRIEFING	All	

, Lead Inspector

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APPENDIX 1-1. DRIVE-BY

Facility: _____ Date: _____ Arrival time: _____

- 1. Drive-by conducted from public right-of-way? Yes No
- 2. Determine the direction "North" with respect to the facility, and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):

3. Obvious concerns visible from public right-of-way (photos)? Yes No

- Containers
- Tanks
- Processing Equipment
- Loading Areas
- Unloading Areas
- Security Devices
- Open Drums
- Stressed Vegetation
- Unusual Staining
- Unusual Odors
- Obvious Discharges
- Improper Disposal
- Safety Concerns
- Other Concerns

APPENDIX 1-2. SITE ENTRY AND INBRIEFING

1. Used main entrance Entered during normal operating hours No excessive delays (>15 min)

2. Facility Representative(s):

Name	Title	Years in position

3. Does representative have intimate knowledge of all waste management practices? Yes No

4. Introduction:

- Presented credentials
- Explained responsibility to provide accurate information and provided Section 1001 and 1002 U.S.C. to facility
- Verified presence at correct facility (checked address/I.D. #)
- Explained authority to conduct inspection (Section 3007 of RCRA)
- Explained purpose, scope, and order of the inspection; completed Multimedia Screening Checklist
- Explained documentation process—worksheets, checklists, photos, notes, statements
- Explained facility's right to claim CBI

5. Was full access granted? By facility representative By other (name): _____

No - Access denied. Name of person denying access: _____

Time of denial: _____

Reason for denial, or limitations placed on access: _____

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, , : RCRA ID#

5. Verified/compared above information with facility Notification Form: Yes No

Describe updates to the Verification Report: _____

6. Hazardous Waste Generator Status: (based on records review)

- Non-generator
 - VSQG (0-100 kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1 kg acute waste or 100 kg of acute spill residue)
 - SQG (100-1000 kg/mo and accumulate <6000 kg)
 - LQG (>1000 kg/mo or >1 kg/mo of acute waste)
- Is facility's status solidly within above category? Yes No (describe)

7. TSD Status: Treatment Storage Disposal Not applicable

Note: If TSD, types of units, number of units, capacities, processes, etc.:

8. Resolved questions from Pre-Inspection Worksheet or Compliance Officer? Yes No No Questions

9. Requested site map or diagram to identify all observations? Yes None Available

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APPENDIX 1-4. GENERATOR WASTE STREAMS

____. **WASTE STREAM:** _____

FACILITY DETERMINATION: Hazardous Nonhazardous Other Not done Inadequate

WASTE CODES: _____

DETERMINATION METHOD: Product knowledge Process knowledge Testing

DOCUMENTATION: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: In SAAs Visually inspected? In storage/Accumulation Visually inspected?

OFF-SITE MANAGEMENT/DISPOSITION: _____

____. **WASTE STREAM:** _____

FACILITY DETERMINATION: Hazardous Nonhazardous Other Not done Inadequate

WASTE CODES: _____

DETERMINATION METHOD: Product knowledge Process knowledge Testing

DOCUMENTATION: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: In SAAs Visually inspected? In storage/Accumulation Visually inspected?

OFF-SITE MANAGEMENT/DISPOSITION: _____

____. **WASTE STREAM:** _____

FACILITY DETERMINATION: Hazardous Nonhazardous Other Not done Inadequate

WASTE CODES: _____

DETERMINATION METHOD: Product knowledge Process knowledge Testing

DOCUMENTATION: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: In SAAs Visually inspected? In storage/Accumulation Visually inspected?

OFF-SITE MANAGEMENT/DISPOSITION: _____

____. **WASTE STREAM:** _____

FACILITY DETERMINATION: Hazardous Nonhazardous Other Not done Inadequate

WASTE CODES: _____

DETERMINATION METHOD: Product knowledge Process knowledge Testing

DOCUMENTATION: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: In SAAs Visually inspected? In storage/Accumulation Visually inspected?

OFF-SITE MANAGEMENT/DISPOSITION: _____

____. **WASTE STREAM:** _____

FACILITY DETERMINATION: Hazardous Nonhazardous Other Not done Inadequate

WASTE CODES: _____

DETERMINATION METHOD: Product knowledge Process knowledge Testing

DOCUMENTATION: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: In SAAs Visually inspected? In storage/Accumulation Visually inspected?

OFF-SITE MANAGEMENT/DISPOSITION: _____

____. **WASTE STREAM:** _____

FACILITY DETERMINATION: Hazardous Nonhazardous Other Not done Inadequate

WASTE CODES: _____

DETERMINATION METHOD: Product knowledge Process knowledge Testing

DOCUMENTATION: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: In SAAs Visually inspected? In storage/Accumulation Visually inspected?

OFF-SITE MANAGEMENT/DISPOSITION: _____

APPENDIX 1-5. OFF-SITE WASTE STREAMS

1. Name or type of waste stream(s): _____

2. Amount and frequency received (note amount per?):

_____ Gallons _____ Pounds _____ Tons per Day Month Year

Other: _____

3. On-site management practices (check all that apply):

Container Storage Tank Storage

Treatment

Disposal Other: _____

4. Off-site management activities: NA

Shipped to: _____

Frequency of shipments: _____

Transporter: _____

Ultimate disposition of waste: Known Unknown

5. Number of years/months facility managed this waste: From: _____ To: _____

6. Facility considers this waste to be: Hazardous Nonhazardous

7. Method of waste determination/identification:

By generator information By testing Not done Inadequate

Describe: _____

8. EPA waste codes: _____

9. Is waste stream consistent with generator Notification? YES NO

10. Notes/Observations: _____

_____, Lead Inspector Attachment _____ Page _____ of _____

1. Name or type of waste stream(s): _____

2. Amount and frequency received (note amount per ?):

_____ Gallons _____ Pounds _____ Tons per Day Month Year

Other: _____

3. On-site management practices (check all that apply):

Container Storage Tank Storage

Treatment

Disposal Other: _____

4. Off-site management activities: NA

Shipped to: _____

Frequency of shipments: _____

Transporter: _____

Ultimate disposition of waste: Known Unknown

5. Number of years/months facility managed this waste: From: _____ To: _____

6. Facility considers this waste to be: Hazardous Nonhazardous

7. Method of waste determination/identification:

By generator information By testing Not done Inadequate

Describe: _____

8. EPA waste codes: _____

9. Is waste stream consistent with generator Notification? YES NO

10. Notes/Observations: _____

, Lead Inspector

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APPENDIX 1-6. RECORDS REVIEW

A. VERY SMALL QUANTITY GENERATOR (VSQG) REQUIREMENTS

1. Has the generator episodically generated >100 kg of hazardous waste or 1 kg of P-listed waste per month
 Yes, complete Appendix 2-2.A to determine generator status No, continue with **APPENDIX 1-6.A**
2. Does the generator use the manifest system (not required)? Yes No
 Were manifests collected to document observations (for example, disposal facilities)? Yes No

A.1. Waste Analysis/Waste Determination and Land Disposal Restrictions

1. Location of waste analysis/waste determination records: _____
2. Person responsible for waste analysis/waste determination: _____

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
3.		Determines if waste is a hazardous waste at the point of generation before any dilution, mixing, or other alteration of the waste occurs, and at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors- 262.14(a)(2)→262.11(a)	
4.		Determines whether a waste meets any of the listings in 40 CFR 261 Subpart D- 262.14(a)(2)→262.11(c)	
5.		Determines whether a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C- 262.14(a)(2)→262.11(d)	

v - in compliance X – not in compliance NA – not applicable

A.2. Allowable Disposition of Hazardous Waste

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		If sent off site, sends hazardous waste to a permitted or interim status TSDF, a recognized municipal solid waste landfill, a recognized non-municipal nonhazardous waste landfill, a legitimate recycler, or a LQG under control of the same person as the VSQG- 262.14(a)(5)	
2.		Does not send free liquids to a landfill for disposal- 262.14(b)	

v - in compliance X – not in compliance NA – not applicable

A.3. Wastes to be Consolidated at LQGs Under the Control of the Generator

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Marks containers as “Hazardous Waste”- 262.14(a)(5)(viii)(B)(1)	
2.		Labels containers with an indication of the nature of the hazard- 262.14(a)(5)(viii)(B)(2)	

v - in compliance X – not in compliance NA – not applicable

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APPENDIX 1-6. RECORDS REVIEW

B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

1. Has the generator episodically generated >1,000 kg of hazardous waste or 1 kg of P-listed waste per month
 Yes, complete **APPENDIX 2-2.B** to determine generator status No, continue with **APPENDIX 1-6.B**
2. Is all hazardous waste reclaimed under a contractual agreement? Yes No, go to **APPENDIX 1-6.B.1**
3. If yes, is the type of waste and frequency of shipments specified in the agreement?
 Yes, continue No, go to **APPENDIX 1-6.B.1**
4. If yes, is the vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator owned and operated by the reclaimer of the waste?
 Yes, continue No, go to **APPENDIX 1-6.B.1**
5. If yes, does the generator maintain a copy of the reclamation agreement in its files for a period of at least 3 years after termination or expiration of the agreement?
 Yes, does the generator maintain the LDR Notice for the initial shipment and copy of LDR Notice kept for 3 years after termination of agreement? Yes No, cite for **268.7(a)(10)**
 No, go to **APPENDIX 1-6.B.1**

B.1. Manifests

#	v/X/NA	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
1.		Uses manifest system- 262.20(a)(1)	
2.		Maintains manifests for 3 years- 262.40(a)	
3.		Has EPA I.D. number- 262.20(a)	
4.		Has generator name, address, phone number on manifest- 262.20(a)	
5.		Has transporter(s) name & EPA I.D. number on manifest- 262.20(a)	
6.		Has designated facility name, address & EPA I.D. number on manifest- 262.20(a)	
7.		Designates alternate facility on manifest (optional)- 262.20(c)	
8.		Has unique pre-printed manifest tracking number and number of pages on manifest- 262.20(a)	
9.		Has DOT shipping name, hazard class, waste code, and reportable quantity (RQ) (if required by 49 CFR 172) on manifest- 262.20(a)	
10.		Has number, type, quantity, unit wt/vol. of containers on manifest- 262.20(a)	
11.		Has proper certification including waste minimization on manifest- 262.20(a)	
12.		Signs and dates manifest and has transporter sign and date manifest- 262.23(a)	

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Attachment _____ Page _____ of _____

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#	v/X/NA	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
13.		Submits exception report if necessary- 262.42	
14.		Sends LDR notification/certification with manifests on first shipment- 262.16(b)(7)→268.7(a)(2)	
15.		Includes manifest number, correct EPA waste codes & treatment standards, and waste analysis data on LDR notification/certification- 262.16(b)(7)→268.7(a)(2)	
16.		Maintains LDR notification/certification/waste analysis data and other documents for 3 years- 262.16(b)(7)→268.7(a)(8)	

v - in compliance X – not in compliance NA – not applicable

17. Approximate number of manifests generated since last inspection, or over past 3 years: _____

18. Approximate number of manifests reviewed: _____

19. Copies of manifests made? YES NO

B.2. Waste Analysis/Waste Determination and Land Disposal Restrictions

1. Location of waste analysis/waste determination records: _____

2. Person responsible for waste analysis/waste determination: _____

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
3.		Does not dilute waste impermissibly to meet LDR standards- 262.16(b)(7)→268.3(a) & (b)	
4.		Determines if waste is a hazardous waste at the point of generation before any dilution, mixing, or other alteration of the waste occurs, and at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors- 262.11(a)	
5.		Determines whether a waste meets any of the listings in 40 CFR 261 Subpart D- 262.11(c)	
6.		Determines whether a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C- 262.11(d)	
7.		Identifies all applicable EPA hazardous waste numbers- 262.11(g)	
8.		Maintains records supporting hazardous waste determinations for at least 3 years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal- 262.11(f)	
9.		Documents waste determination, including results of any tests, sampling, waste analyses, or other determinations; documentation of tests, sampling, and analytical methods; descriptions or processes, waste composition, and waste properties; and records which explain the knowledge basis- 262.11(f)	

, Lead Inspector

Attachment _____ Page _____ of _____

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#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
10.		Determines waste does <u>not</u> meet applicable treatment standards (ATS)- 262.16(b)(7)→268.7(a)(2)	
11.		Submits a one-time written notice to TSDf with initial shipment and a copy placed in file- 262.16(b)(7)→268.7(a)(2)	
12.		Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition- 262.16(b)(7)→268.5 & 6 (Describe the variance, extension, or petition that applies)	
13.		If waste is shipped off site for disposal, provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs- 262.16(b)(7)→268.7(a)(4)	
14.		If waste is shipped off site for disposal, provides a notice with initial shipment, or new notification, if changes occur- 262.16(b)(7)→268.7(a)(2)	
15.		If waste is shipped off site for disposal, includes on the LDR notice: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable- 262.16(b)(7)→268.7(a)(2) and (a)(4)	
16.		If waste is determined waste to be excluded from the definition of hazardous or solid waste, retains a one-time notice describing generation, subsequent exclusion or exemption, and disposition of the waste, in the facility's on-site files- 262.16(b)(7)→268.7(a)(7)	
17.		If generator determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment, submits a one-time written notice to TSDf with initial shipment and a copy placed in file- 262.16(b)(7)→268.7(a)(3)(i)	
18.		If waste is not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i)- 262.16(b)(7)→268.9(a)	
19.		If waste is land disposed, determines if waste meets the treatment standards specified in 268 Subpart D- 262.16(b)(7)→268.9(c)	
20.		If claiming that their characteristic waste is no longer hazardous, sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes in process, operation, or receiving facility- 262.16(b)(7)→268.9(d)	

v - in compliance X – not in compliance NA – not applicable

If hazardous waste prohibited from land disposal is any of the following: a contaminated soil, or a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge, complete additional LDR checklists in **APPENDIX 2-1**

21. Notes/Observations: _____

, Lead Inspector

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B.3. Preparedness/Prevention and Training

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Designates an emergency coordinator and that person is on site or on-call- 262.16(b)(9)(i)	
2.		Posts emergency coordinator's name and phone number, fire department's phone number, and locations of fire extinguishers and spill control equipment near the phone- 262.16(b)(9)(ii)	
3.		Makes arrangements with local emergency agencies- 262.16(b)(8)(vi)(A)	
4.		Familiarizes coordinating agencies with layout, waste types, access points, evacuation routes, and likely casualty types- 262.16(b)(8)(vi)(A)(2)	
5.		In the event of more than one responding FD or PD, designates a primary agency - 262.16(b)(8)(vi)(A)(3)	
6.		Maintains records documenting arrangements with response agencies- 262.16(b)(8)(vi)(B)	
7.		In the event of a fire or spill, immediately responds or coordinates with a response agency or contractor- 262.16(b)(9)(iv)	
8.		Familiarizes all employees with waste handling and emergency procedures relevant to their responsibilities- 262.16(b)(9)(iii)	

v - in compliance X – not in compliance NA – not applicable

9. Notes/Observations: _____

B.4. Re-Notification (effective 2021)

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Renotifies EPA of hazardous waste activity every 4 years by September 1- 262.18(d)(1)	

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APPENDIX 1-6. RECORDS REVIEW

C. LARGE QUANTITY GENERATOR (LQG) REQUIREMENTS

C.1. Manifests

#	v/X/NA	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
1.		Uses manifest system- 262.20(a)(1)	
2.		Maintains manifests for 3 years- 262.40(a)	
3.		Has EPA I.D. number- 262.20(a)	
4.		Has generator name, address, phone number on manifest- 262.20(a)	
5.		Has transporter(s) name & EPA I.D. number on manifest- 262.20(a)	
6.		Has designated facility name, address & EPA I.D. number on manifest- 262.20(a)	
7.		Designates alternate facility on manifest (optional)- 262.20(c)	
8.		Has unique pre-printed manifest tracking number and number of pages on manifest- 262.20(a)	
9.		Has DOT shipping name, hazard class, waste code, and reportable quantity (RQ) (if required by 49 CFR 172) on manifest- 262.20(a)	
10.		Has number, type, quantity, unit wt/vol. of containers on manifest- 262.20(a)	
11.		Has proper certification including waste minimization on manifest- 262.20(a)	
12.		Signs and dates manifest and has transporter sign and date manifest- 262.23(a)	
13.		Submits exception report if necessary- 262.42	
14.		Sends LDR notification/certification with manifests on first shipment- 262.17(a)(9)→268.7(a)(2)	
15.		Includes manifest number, correct EPA waste codes & treatment standards, and waste analysis data on LDR notification/certification- 262.17(a)(9)→268.7(a)(2)	
16.		Maintains LDR notification/certification/waste analysis data and other documents for 3 years- 262.17(a)(9)→268.7(a)(8)	

v - in compliance X – not in compliance NA – not applicable

17. Approximate number of manifests generated since last inspection, or over past 3 years: _____

21. Approximate number of manifests reviewed: _____

22. Copies of manifests made? YES NO

, Lead Inspector

Attachment _____ Page _____ of _____

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C.2. Waste Analysis/Waste Determination and Land Disposal Restrictions

1. Location of waste analysis/waste determination records: _____
2. Person responsible for waste analysis/waste determination: _____

#	v/x/na	REGULATORY REQUIREMENTS	COMMENTS
3.		Does not dilute waste impermissibly to meet LDR standards- 268.3(a) & (b)	
4.		Determines if waste is a hazardous waste at the point of generation before any dilution, mixing, or other alteration of the waste occurs, and at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors- 262.11(a)	
5.		Determines whether a waste meets any of the listings in 40 CFR 261 Subpart D- 262.11(c)	
6.		Determines whether a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C- 262.11(d)	
7.		Identifies all applicable EPA hazardous waste numbers- 262.11(g)	
8.		Maintains records supporting hazardous waste determinations for at least 3 years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal- 262.11(f)	
9.		Documents waste determination, including results of any tests, sampling, waste analyses, or other determinations; documentation of tests, sampling, and analytical methods; descriptions or processes, waste composition, and waste properties; and records which explain the knowledge basis- 262.11(f)	
10.		Determines waste does <u>not</u> meet applicable treatment standards (ATS)- 268.7(a)(2)	
11.		Submits a one-time written notice to TSDf with initial shipment and a copy placed in file- 268.7(a)(2)	
12.		Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition- 268.5 & 6 (Describe the variance, extension, or petition that applies)	
13.		If waste is shipped off site for disposal, provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs- 268.7(a)(4)	
14.		If waste is shipped off site for disposal, provides a notice with initial shipment, or new notification, if changes occur- 268.7(a)(2)	

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Attachment _____ Page _____ of _____

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#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
15.		If waste is shipped off site for disposal, includes on the LDR notice: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable- 268.7(a)(2)→268.7(a)(4)	
16.		If waste is determined waste to be excluded from the definition of hazardous or solid waste, retains a one-time notice describing generation, subsequent exclusion or exemption, and disposition of the waste, in the facility's on-site files- 268.7(a)(7)	
17.		If generator determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment, submits a one-time written notice to TSD with initial shipment and a copy placed in file- 268.7(a)(3)(i)	
18.		If waste is not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i)- 268.9(a)	
19.		If waste is land disposed, determines if waste meets the treatment standards specified in 268 Subpart D- 268.9(c)	
20.		If claiming that their characteristic waste is no longer hazardous, sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes in process, operation, or receiving facility- 268.9(d)	

v - in compliance X – not in compliance NA – not applicable

If hazardous waste prohibited from land disposal is any of the following: a contaminated soil, or a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge – Complete additional LDR checklists in **APPENDIX 2-1**

21. Notes/Observations: _____

, Lead Inspector

Attachment _____ Page _____ of _____

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C.3. Preparedness and Prevention

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Designates an emergency coordinator who is on premises or on call- 262.17(a)(6)→262.264	
2.		Ensures emergency coordinator is thoroughly familiar with all aspects of the generator’s operations- 262.17(a)(6)→262.264	
3.		Makes arrangements with local emergency agencies- 262.17(a)(6)→262.256(a)	
4.		Familiarizes emergency agencies with the layout of the facility, properties of hazardous waste handled at the facility, normal work locations, entrances and roads inside the facility, possible evacuation routes, and typical injuries or illnesses which could result from an incident- 262.17(a)(6)→262.256(a)(2)	
5.		If more than one police or fire department might respond, designates a primary response entity- 262.17(a)(6)→262.256(a)(3)	
6.		Maintains records documenting arrangements with response agencies or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made- 262.17(a)(6)→262.256(b)	
7.		If a generator has 24-hour response capabilities in lieu of arrangements, obtains a waiver of arrangements with emergency response agencies- 262.17(a)(6)→262.256(c)	

√ - in compliance X – not in compliance NA – not applicable

C.4. Contingency Planning

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Has contingency plan- 262.17(a)(6)→262.260(a)	
2.		Reviews and amends contingency plan when (a) regulations are revised; (b) the plan fails in an emergency; (c) the generator’s operations materially change to increase risk of fire, explosions, or releases; (d) the ECs change; or (e) the emergency equipment changes- 262.17(a)(6)→262.263(a) through 263(e)	
3.		Submits contingency plan to emergency response agencies- 262.17(a)(6)→262.262(a)	
4.		Includes in contingency plan description of actions needed to respond to fires, explosions, or releases of hazardous wastes- 262.17(a)(6)→262.261(a)	

, Lead Inspector

Attachment _____ Page _____ of _____

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#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
5.		Includes in contingency plan description of arrangements with local emergency agencies, as appropriate- 262.17(a)(6)→262.261(c)	
6.		Identifies EC(s) by name (or by position title for 24-hour facilities) and lists emergency telephone number(s) in contingency plan- 262.17(a)(6)→262.261(d)	
7.		Keeps list of ECs up-to-date- 262.17(a)(6)→262.261(d)	
8.		If more than one EC, designates one as primary and lists the others in the order they will assume responsibility as alternates- 262.17(a)(6)→262.61(d)	
9.		Lists in contingency plan and describes emergency equipment, its location, and its capabilities- 262.17(a)(6)→262.261(e)	
10.		Includes in contingency plan complete evacuation plan, including route, signal, and alternate route (if required)- 262.17(a)(6)→262.261(f)	
11.		Prepares a quick reference guide and submits it to emergency response agencies (new facilities beginning operations after May 30, 2017, or facilities revising the contingency plan after that date)- 262.17(a)(6)→262.262(b)	
12.		Includes in the quick reference guide: (1) list and description of hazardous waste described in layman’s terms; (2) estimated maximum amounts of each hazardous waste; (3) identification of any hazardous waste that would result in unique or special medical issues; (4) a map showing where hazardous waste is generated or managed and access routes to these locations; (5) a map of the facility in relation to surrounding businesses, schools, and residential areas to allow access and evacuation planning; (6) locations of water supplies; (7) identification of on-site notification systems or alarms; and (8) name and 24/7 telephone number for the EC- 262.17(a)(6)→262.262(b)(1) through (b)(8)	
13.		Updates and resubmits quick reference guide to emergency response agencies when needed- 262.17(a)(6)→262.262(c)	

v - in compliance X – not in compliance NA – not applicable

11. Notes/Observations: _____

, Lead Inspector

Attachment _____ Page _____ of _____

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C.5. Personnel Training

#	v/x/na	REGULATORY REQUIREMENTS	COMMENTS
1.		Trains hazardous waste personnel to perform their duties in a way that ensures compliance using a program of classroom instruction, online training (e.g., computer-based or electronic), or on-the-job training- 262.17(a)(7)(i)(A)	
2.		Ensures instructor trained in hazardous waste management procedures- 262.17(a)(7)(i)(B)	
3.		Includes in hazardous waste training: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required- 262.17(a)(7)(i)(C)	
4.		Initially trains new employees within 6 months of employment or assignment to the generator or position- 262.17(a)(7)(ii)	
5.		Refreshes hazardous waste training annually- 262.17(a)(7)(iii)	
6.		Tracks specific job titles and names of persons filling positions- 262.17(a)(7)(iv)(A)	
7.		Describes, in writing, skills, education or qualification, and duties associated with each job title- 262.17(a)(7)(iv)(B)	
8.		Prepares written description of type and amount of introductory and continuing training- 262.17(a)(7)(iv)(C)	
9.		Maintains documentation confirming training has been completed- 262.17(a)(7)(iv)(D)	
10.		Maintains training records of current employees and for 3 years of former employees- 262.17(a)(7)(v)	

v - in compliance X – not in compliance NA – not applicable

11. Notes/Observations: _____

, Lead Inspector

Attachment _____ Page _____ of _____

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C.6. RCRA Air Emissions

1. Location of records: _____
2. Person responsible for records: _____
3. Applicability:

Subpart AA. Does the generator have any hazardous waste management unit using the following processes: distillation, fractionation, thin- film evaporation, solvent extraction, air stripping and steam stripping?
 YES, complete **APPENDIX 2-3.A** checklist NO

Subpart BB equipment. Does the generator have any valves, flanges, or pumps that contain or contact hazardous wastes with >10% organics?
 YES, complete **APPENDIX 2-3.B** checklist NO

Subpart CC tanks and containers. Are any units at the facility subject to the CC Rule (managing hazardous waste with concentrations of volatile organic compounds of 500 ppmw or greater)?
 YES, continue NO, explain: _____

Does the generator manage volatile organic waste only:

- In DOT-compliant containers with volumes less than 122 gallons OR
 - In DOT-compliant containers greater than 122 gallons (not light liquid service)?
- YES, generator is in compliance with Subpart CC NO, complete **APPENDIX 2-3.C** checklist

C.7. Wastes Received From Very Small Quantity Generators

1. Does the generator receive waste from another generator facility? Yes No, continue to **APPENDIX 1-6.C.8**
2. If yes, is the facility from which the waste was received also under control of the operator of this LQG?
 Yes No-**cite for operating a TSDF**
3. If yes, is the facility from which the waste was received a very small quantity generator (less than 100 kg of hazardous waste and less than 1 kg of P-listed hazardous waste per month)?
 Yes, complete **APPENDIX 2-4** checklist No, **cite for operating a TSDF without a permit**

C.8. Reporting and Re-notification

#	√/X/NA	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
1.		Submits Biennial Report- 262.41	
2.		Re-notifies for hazardous waste activity- 262.18(d)(2)	

√ - in compliance X – not in compliance NA – not applicable

C.9. Closure of Container Accumulation or Tanks

1. Are any CAAs or accumulation tanks that were in use during a previous inspection no longer in use?

No

Yes, Describe: _____

APPENDIX 1-6. RECORDS REVIEW

D. TREATMENT, STORAGE, AND DISPOSAL FACILITY (TSDF) REQUIREMENTS

Requirements for interim status facilities (40 CFR Part 265) are used for all citations in **APPENDIX 1-6.D**. For permitted TSDFs, cite the parallel requirement from the facility permit.

D.1. Manifests for Wastes Generated at the Facility

#	v/X/NA	REGULATORY REQUIREMENTS*	MANIFEST #'S AND COMMENTS
1.		Uses manifest system- 262.20(a)(1)	
2.		Maintains manifests for 3 years- 262.40(a)	
3.		Has EPA I.D. number- 262.20(a)	
4.		Has generator name, address, phone number on manifest- 262.20(a)	
5.		Has transporter(s) name & EPA I.D. number on manifest- 262.20(a)	
6.		Has designated facility name, address, & EPA I.D. number on manifest- 262.20(a)	
7.		Designates alternate facility on manifest (optional)- 262.20(c)	
8.		Has unique pre-printed manifest tracking number and number of pages on manifest- 262.20(a)	
9.		Has DOT shipping name, hazard class, waste code, and reportable quantity (RQ) (if required by 49 CFR 172) on manifest- 262.20(a)	
10.		Has number, type, quantity, unit wt/vol. of containers on manifest- 262.20(a)	
11.		Has proper certification including waste minimization on manifest- 262.20(a)	
12.		Signs and dates manifest, and has transporter sign and date manifest- 262.23(a)	
13.		Submits exception report if necessary- 262.42	
14.		Sends LDR notification/certification with manifests on first shipment- 268.7(a)(2)	
15.		Includes manifest number, correct EPA waste codes & treatment standards, and waste analysis data on LDR notification/certification- 268.7(a)(2)	
16.		Maintains LDR notification/certification/waste analysis data and other documents for 3 years- 268.7(a)(8)	

v - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

, Lead Inspector

Attachment _____ Page _____ of _____

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, , : RCRA ID#

17. Approximate number of manifests generated since last inspection, or over past 3 years: _____

18. Approximate number of manifests reviewed: _____

19. Copies of manifests made? YES NO

D.2. Manifests for Wastes Received by the Facility

#	√/X/NA	REGULATORY REQUIREMENTS*	MANIFEST #'S AND COMMENTS
1.		Signs and dates manifests- 265.71(a)(2)(i)	
2.		Notes and corrects manifest discrepancies within 15 days- 265.71(a)(2)(ii)	
3.		Gives copy to transporter immediately after receiving waste- 265.71(a)(2)(iii)	
4.		Sends copy to generator within 30 days- 265.71(a)(2)(iv)	
5.		Retains manifests for 3 years- 265.71(a)(2)(v)	
6.		Maintains LDR notification/certifications for 3 years- 268.7(e)(2)	
7.		Submits Biennial Reports- 265.75	

√ - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

8. Approximate number of manifests generated since last inspection, or over past 3 years: _____

9. Approximate number of manifests reviewed: _____

10. Copies of manifests made? YES NO

, Lead Inspector

Attachment _____ Page _____ of _____

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D.3. Waste Analysis/Waste Determination and Land Disposal Restrictions

1. Location of waste analysis/waste determination records: _____
2. Person responsible for waste analysis/waste determination: _____

#	v/x/na	REGULATORY REQUIREMENTS*	COMMENTS
3.		Does not dilute waste impermissibly to meet LDR standards- 268.3(a) & (b)	
4.		Determines if waste is a hazardous waste at the point of generation before any dilution, mixing, or other alteration of the waste occurs, and at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors- 262.11(a)	
5.		Determines whether a waste meets any of the listings in 40 CFR 261 Subpart D- 262.11(c)	
6.		Determines whether a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C- 262.11(d)	
7.		Identifies all applicable EPA hazardous waste numbers- 262.11(g)	
8.		Maintains records supporting hazardous waste determinations for at least 3 years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal- 262.11(f)	
9.		Documents waste determination, including results of any tests, sampling, waste analyses, or other determinations; documentation of tests, sampling, and analytical methods; descriptions or processes, waste composition, and waste properties; and records which explain the knowledge basis- 262.11(f)	
10.		Determines waste does <u>not</u> meet applicable treatment standards (ATS)- 268.7(a)(2)	
11.		Submits a one-time written notice to TSDf with initial shipment and a copy placed in file- 268.7(a)(2)	
12.		Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition- 268.5 & 6 (Describe the variance, extension, or petition that applies)	
13.		If waste is shipped off site for disposal, provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs- 268.7(a)(4)	
14.		If waste is shipped off site for disposal, provides a notice with initial shipment, or new notification, if changes occur- 268.7(a)(2)	

, Lead Inspector

Attachment _____ Page _____ of _____

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#	v/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
15.		If waste is shipped off site for disposal, includes on the LDR notice the following: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable- 268.7(a)(2)→268.7(a)(4)	
16.		If waste is determined waste to be excluded from the definition of hazardous or solid waste, retains a one-time notice describing generation, subsequent exclusion or exemption, and disposition of the waste, in the facility's on-site files- 268.7(a)(7)	
17.		If generator determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment, submits a one-time written notice to TSDF with initial shipment and a copy placed in file- 268.7(a)(3)(i)	
18.		If waste is not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i)- 268.9(a)	
19.		If waste is land disposed, determines if waste meets the treatment standards specified in 268 Subpart D- 268.9(c)	
20.		If claiming that their characteristic waste is no longer hazardous, sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes in process, operation, or receiving facility- 268.9(d)	

v - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

If hazardous waste prohibited from land disposal is any of the following: a contaminated soil, or a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge – See additional LDR checklists in **APPENDIX 2-1**

21. Notes/Observations: _____

D.4. Preparedness and Prevention

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Makes arrangements with local emergency agencies- 265.37	
2.		Has emergency coordinator on premises or on call- 265.55	

√ - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

D.5. Contingency Planning

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Has contingency plan- 265.51(a)	
2.		Maintains contingency plan on site- 265.53(a)	
3.		Submits contingency plan to emergency response agencies- 265.53(b)	
4.		Includes in contingency plan description of actions needed to respond to fires, explosions, or releases of hazardous wastes- 265.52(a)	
5.		Includes in contingency plan description of arrangements with local emergency agencies, as appropriate- 265.52(c)	
6.		Lists in contingency plan names, addresses, and phone numbers (both home and office) of EC(s)- 265.52(d)	
7.		Lists in contingency plan and describes emergency equipment, its location, and its capabilities- 265.52(e)	
8.		Includes in contingency plan complete evacuation plan (signal, alternate route), if required- 265.52(f)	
9.		Ensures EC is thoroughly familiar with all aspects of facility- 265.55	

√ - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

10. Notes/Observations: _____

D.6. Personnel Training

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Trains program director in hazardous waste management procedures- 265.16(a)(2)	
2.		Ensures employees do not work unsupervised without completing training & are trained within 6 mo. of initial hiring- 265.16(b)	
3.		Refreshes hazardous waste training annually- 265.16(c)	
4.		Tracks specific job title and name of person filling position- 265.16(d)(1)	
5.		Describes, in writing, skills, education or qualification, and duties associated with each job title- 265.16(d)(2)	
6.		Prepares written description of type and amount of introductory and continuing training- 265.16(d)(3)	
7.		Includes in training the following: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required- 265.16(a)(3)	
8.		Maintains documentation confirming training has been completed- 265.16(d)(4)	
9.		Maintains records on site of current employees and for 3 years of former employees- 265.16(d) & (e) respectively	

√ - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

10. Notes/Observations: _____

D.7. Operating Record

#	v/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Maintains written operation record on site, and until closure- 265.73(a) & (b) respectively	
2.		Includes in the operating record the following: description of quantity (estimated weight or volume & density), method(s) and date(s) of treatment, storage, or disposal—including name & EPA waste code(s), physical form, process which produced waste, & handling codes- 265.73(b)(1)	
3.		Cross-references location and quantity of each hazardous waste at facility to the specific manifest- 265.73(b)(2)	

v - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

D.8. Inspections

#	v/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Inspects the facility for malfunctions and discharges which may lead to a release or human threat- 265.15(a)	
2.		Prepares a written schedule for inspecting and monitoring safety, emergency, security, operating and structural equipment- 265.15(b)(1)	
3.		Maintains the schedule at facility- 265.15(b)(2)	
4.		Identifies all types of problems sought and frequency of inspections- 265.15(b)(3) and (b)(4)	
5.		Inspects areas subject to spills, such as daily loading/unloading areas when in use- 265.15(b)(4)	
6.		Remedies all problems found- 265.15(c)	
7.		Records name of inspector, date and time of inspection, and date and nature of repairs- 265.15(d)	
8.		Maintains inspection records for 3 years- 265.15(d)	

v - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

, Lead Inspector

Attachment _____ Page _____ of _____

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D.9. Closure/Post-Closure

#	v/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Has written closure plan & provides unapproved plan during inspections- 265.112(a)	
2.		Describes how and when the facility and each unit will be closed- 265.112(b)(1), (b)(2), and (b)(6)	
3.		Estimates maximum inventory of hazardous waste ever on site- 265.112(b)(3)	
4.		Describes, in detail, steps needed to remove and decontaminate all hazardous waste residues and equipment- 265.112(b)(4)	
5.		Describes all other closure activities- 265.112(b)(5)	
6.		Prepares schedule for closure of each hazardous waste management unit- 265.112(b)(6)	
7.		If planning to use trust funds, specifies year of closure- 265.112(b)(7)	
8.		If a disposal facility, has written post-closure plan- 265.118(a)	

v - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

D.10. Financial Requirements

#	v/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Maintains closure/post-closure cost estimates at facility- 265.142(d)/265.144(d)	
2.		Prepares written cost estimate in current dollars for closure and/or post- closure- 265.142(a) &/or 265.144(a)	
3.		Bases cost estimate on maximum inventories and greatest expense for closure- 265.142(a)(1)	
4.		Bases cost estimate on hiring a third party to perform closure/post-closure- 265.142(a)(2) / 265.144(a)(1)	
5.		Does not incorporate salvage/sale values into cost estimates- 265.142(a)(3)	
6.		Adjusts cost estimate for inflation 60 days prior to anniversary date- 265.142(b) / 265.144(b)	
7.		Establishes financial assurance instrument for closure/post-closure- 265.143 / 265.145 (note type of instrument used)	
8.		Has liability insurance or passes financial test for sudden and non-sudden (land treatment/disposal only) occurrences- 265.147(a) & (b)	

v - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

, Lead Inspector

Attachment _____ Page _____ of _____

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D.11. RCRA Air Emissions

1. Is facility an Interim Status TSD Permitted TSD

2. Location of records: _____

3. Applicability:

Subpart AA. Does the generator have any hazardous waste management unit using the following processes: distillation, fractionation, thin- film evaporation, solvent extraction, air stripping and steam stripping?

YES, complete **APPENDIX 2-3.A** checklist NO

Subpart BB equipment. Does the generator have any valves, flanges, or pumps that contain or contact hazardous wastes with >10% organics?

YES, complete **APPENDIX 2-3.B** checklist NO

Subpart CC tanks and containers. Are any units at the facility subject to the CC Rule (managing hazardous waste with concentrations of volatile organic compounds of 500 ppmw or greater)?

YES, continue NO, explain: _____

Does the TSDF manage volatile organic waste only:

- In DOT-compliant containers with volumes less than 122 gallons OR
- In DOT-compliant containers greater than 122 gallons (not light liquid service)?

YES, TSDF is in compliance with Subpart CC NO, complete **Appendix 2-3.C** checklist

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3. For any SAAs **with compliance issues**, describe below. Note: if an area claimed by the facility as a SAA is (a) not at or near the point of generation, (b) not under control of the operator, OR (c) has quantities exceeding 55 gallons (or 1 kg or 1 quart of P-listed waste) for longer than 3 days, the area should be considered a CAA and inspected using the CAA checklist for the generator category (262.15(a)).

REGULATORY REQUIREMENTS	SA__	SA__	SA__	SA__	SA__	SA__
Labels containers as "Hazardous Waste"- 262.15(a)(5)(i)						
Labels containers with an indication of the nature of the hazard, DOT, OSHA or NFPA placard- 262.15(a)(5)(ii)						
Keeps containers closed when not adding waste or for temporary venting-262.15(a)(4)						
Uses containers that are in good condition- 262.15(a)(1)						
Uses containers that are compatible with waste- 262.15(a)(2)						
Does not put incompatible wastes in the same container- 262.15(a)(3)(i)						
Does not put wastes in an unwashed container that previously held an incompatible waste- 262.15(a)(3)(ii)						
Separates containers of incompatible wastes and/or incompatible wastes and materials, or protects them from each other- 262.15(a)(3)(iii)						

√ - in compliance X – not in compliance NA – not applicable

Above Satellite Areas with problems:

SA__: Name/Location of area: _____

Person responsible for area: _____

SA__: Name/Location of area: _____

Person responsible for area: _____

SA__: Name/Location of area: _____

Person responsible for area: _____

SA__: Name/Location of area: _____

Person responsible for area: _____

SA__: Name/Location of area: _____

Person responsible for area: _____

SA__: Name/Location of area: _____

, Lead Inspector

Attachment _____ Page _____ of _____

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, , : RCRA ID#

Person responsible for area: _____

, Lead Inspector

Attachment _____ Page _____ of _____

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APPENDIX 1-7. VISUAL REVIEW

B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

B.1. Required Response Equipment and Hazard Management

Note: Per 262.15(a)(7), this equipment must be available even if waste is accumulated only in SAAs.

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Operates to minimize possibility of a fire, explosion, or release- 262.16(b)(8)(i)	
2.		Provides an internal communications or alarm system- 262.16(b)(8)(ii)(A)	
3.		Provides device available for and capable of summoning emergency assistance- 262.16(b)(8)(ii)(B)	
4.		Provides adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)- 262.16(b)(8)(ii)(C)	
5.		Provides adequate water supply for fire control equipment- 262.16(b)(8)(ii)(D)	
6.		Tests and maintains communication and emergency equipment- 262.16(b)(8)(iii)	
7.		Has communication equipment immediately accessible when waste is being handled- 262.16(b)(8)(iv)(A)	
8.		Has communication equipment immediately accessible when only one person present on site- 262.16(b)(8)(iv)(B)	
9.		Provides adequate aisle space for type of waste management and emergency equipment used- 262.16(b)(8)(v)	

√ - in compliance X – not in compliance NA – not applicable

, Lead Inspector

Attachment _____ Page _____ of _____

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B.2. Container Accumulation Area (CAA)

1. Name _____
 (Complete one form per CAA)

2. Type of accumulation: <180 day <270 day

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
3.		Uses containers that are in good condition- 262.16(b)(2)(i)	
4.		Uses containers that are compatible with waste- 262.16(b)(2)(ii)	
5.		Keeps containers closed- 262.16(b)(2)(iii)(A)	
6.		Does not open, handle, or manage containers in a manner to cause them to leak- 262.16(b)(2)(iii)(B)	
7.		Inspects CAA weekly- 262.16(b)(2)(iv)	
8.		Does not put incompatible wastes in the same container- 262.16(b)(2)(v)(A)	
9.		Does not put wastes in an unwashed container that previously held an incompatible waste- 262.16(b)(2)(v)(B)	
10.		Separates containers of incompatible wastes and/or incompatible wastes and materials, or protects them from each other- 262.16(b)(2)(v)(C)	
11.		Labels containers as "Hazardous Waste"- 262.16(b)(6)(i)(A)	
12.		Labels containers with an indication of the nature of the hazard- 262.16(b)(6)(i)(B)	
13.		Marks containers with accumulation start dates- 262.16(b)(6)(i)(C)	
PRE-TRANSPORT REQUIREMENTS			
14.		Packs, labels, and marks container per DOT requirements- 262.30, 262.31,262.32, respectively	
15.		Provides placards for use by transporters when applicable- 262.33	
16.		Marks containers with all applicable EPA hazardous waste numbers- 262.11(g)	

√ - in compliance X – not in compliance NA – not applicable

, Lead Inspector

Attachment _____ Page _____ of _____

This checklist is solely intended as guidance. The questions in this document are not exhaustive nor determinative, and may not be relied on to create a substantive or procedural right or benefit enforceable at law by any person.

B.3. Tank Accumulation Area(s)

1. Total number of tanks at facility: _____

2. Type of accumulation: <180 day <270 day

#	REGULATORY REQUIREMENTS	Tank # ___	Tank # ___	Tank # ___	Tank # ___	Tank # ___
3.	Accumulates reactive waste and mixture of incompatible wastes so that it does not: (1) generate extreme heat or pressure, fire, or explosion, or violent reaction; (2) produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health; (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; (4) damage the structural integrity of the device or facility containing the waste; or (5) via other like means threaten human health or the environment- 262.16(b)(3)(ii)(A)→265.17(b)(1) through (b)(5)					
4.	Ensures wastes are not likely to cause corrosion or other tank failure- 262.16(b)(3)(ii)(B)					
5.	Ensures tanks have 2 feet of freeboard or containment system- 262.16(b)(3)(ii)(C)					
6.	Equips continuously fed tanks with feed cut-off system or by-pass system- 262.16(b)(3)(ii)(D)					
7.	Inspects daily: waste feed cut-off/by-pass system, monitoring equipment, freeboard, & tank levels- 262.16(b)(3)(iii)(A)					
8.	Records data gathered from pressure and temperature gauges daily- 262.16(b)(3)(iii)(B)					
9.	Measures waste level daily- 262.16(b)(3)(iii)(C)					
10.	If tanks have full secondary containment AND documented leak detection equipment/procedures, inspects weekly for items 6-8 above- 262.15(b)(3)(iv)					
11.	Conducts weekly inspections of tanks for leaks, discharges, & corrosion- 262.16(b)(3)(iii)(D)					
12.	Conducts weekly inspections of areas around tanks for leaks or discharges- 262.16(b)(3)(iii)(E)					
13.	Treats or accumulates ignitable/reactive wastes so as to prevent ignition OR uses a tank only for emergencies- 262.16(b)(3)(vii)(A)					
14.	Treats or accumulates ignitable/reactive waste per NFPA's buffer zone requirements- 262.16(b)(3)(vii)(B)					

, Lead Inspector

Attachment _____ Page _____ of _____

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#	REGULATORY REQUIREMENTS	Tank #___	Tank #___	Tank #___	Tank #___	Tank #___
15.	Does not put incompatible wastes in same tank- 262.16(b)(3)(vii)(C)(1)					
16.	Does not put wastes in an unwashed container that previously held an incompatible waste- 262.16(b)(3)(vii)(C)(2)					
17.	Labels tanks as "Hazardous Waste"- 262.16(b)(6)(ii)(A)					
18.	Labels tanks with an indication of the nature of the hazard- 262.16(b)(6)(ii)(B)					
19.	Demonstrates that tanks are emptied within 180/270 days using inventory logs, monitoring equipment, or other records- 262.16(b)(6)(ii)(C)					
20.	Has inventory logs or records demonstrating accumulation time available for inspection- 262.16(b)(6)(ii)(D)					

V - in compliance X – not in compliance NA – not applicable

Tank #___ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: YES NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank #___ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: YES NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: YES NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: YES NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: YES NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

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APPENDIX 1-7. VISUAL REVIEW

C. LARGE QUANTITY GENERATOR (LQG) REQUIREMENTS

C.1. Required Response Equipment

Note: Per 262.15(a)(8), this equipment must be available even if waste is only accumulated in SAAs.

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Operates to minimize possibility of a fire, explosion, or release- 262.17(a)(6)→262.251	
2.		Provides an internal communications or alarm system- 262.17(a)(6)→262.252(a)	
3.		Provides device available for and capable of summoning emergency assistance- 262.17(a)(6)→262.252(b)	
4.		Provides adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)- 262.17(a)(6)→262.252(c)	
5.		Provides adequate water supply for fire control equipment- 262.17(a)(6)→262.252(d)	
6.		Tests communication and emergency equipment- 262.17(a)(6)→262.253	
7.		Has communication equipment immediately accessible when waste is being handled- 262.17(a)(6)→262.254(a)	
8.		Has communication equipment immediately accessible when only one person present on site- 262.17(a)(6)→262.254(b)	
9.		Provides adequate aisle space for type of waste management and emergency equipment used- 262.17(a)(6)→262.255	

√ - in compliance X – not in compliance NA – not applicable

, Lead Inspector

Attachment _____ Page _____ of _____

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C.2. Container Accumulation Area (CAA)

1. Name _____
 (Complete one form per CAA)

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
2.		Uses containers that are in good condition- 262.17(a)(1)(ii)	
3.		Uses containers that are compatible with waste- 262.17(a)(1)(iii)	
4.		Keeps containers closed- 262.17(a)(1)(iv)(A)	
5.		Does not open, handle, or manage containers in a manner to cause them to leak- 262.17(a)(1)(iv)(B)	
6.		Inspects CAA weekly - 262.17(a)(1)(v)	
7.		Keeps containers of ignitable/reactive waste more than 50 feet from property line- 262.17(a)(1)(vi)(A)	
8.		Takes measures to prevent accidental ignition or reaction of ignitable/reactive waste, including separation from ignition sources, smoking/open flame restrictions, and “No Smoking” signs- 262.17(a)(1)(vi)(B)	
9.		Does not put incompatible wastes in the same container- 262.17(a)(1)(vii)(A)	
10.		Does not put wastes in an unwashed container that previously held an incompatible waste- 262.17(a)(1)(vii)(B)	
11.		Separates containers of incompatible wastes and/or incompatible wastes and materials, or protects them from each other- 262.17(a)(1)(vii)(C)	
12.		Labels containers as “Hazardous Waste”- 262.17(a)(5)(i)(A)	
13.		Labels containers with an indication of the nature of the hazard- 262.17(a)(5)(i)(B)	
14.		Marks containers with accumulation start dates- 262.17(a)(5)(i)(C)	
PRE-TRANSPORT REQUIREMENTS			
15.		Packs, labels, and marks container per DOT requirements- 262.30, 262.31,262.32, respectively	
16.		Provides placards for use by transporters when applicable- 262.33	
17.		Marks containers with all applicable EPA hazardous waste numbers- 262.11(g)	

v - in compliance X – not in compliance NA – not applicable

, Lead Inspector

Attachment _____ Page _____ of _____

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18. Container inventory: Actual Count Approximate count

Waste Type	Oldest Date	Volume per Container	# of Containers	Total Volume

Total Quantity (pounds, gallons, etc.): _____

19. How were container volumes verified? _____

20. Container management area location noted on map or diagram: YES NO

21. Notes/Observations: _____

C.3. Tank Accumulation Area(s)

1. Total number of tanks at facility: _____

Assessing EXISTING tanks (tanks used for storage or treatment and that are in operation, or for which installation commenced on or prior to July 14, 1986) without secondary containment:

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
2.		Has independent PE assess all existing tanks- 262.17(a)(2)→265.191(a)	
3.		Assesses existing systems that store material which became hazardous waste subsequent to July 14, 1986- 262.17(a)(2)→265.191(c)	
4.		Includes in assessment the following: design standards, characteristics of waste, existing corrosion protection, age, leak test for non-enterable tanks, and ancillary equipment- 262.17(a)(2)→265.191(b)	

v - in compliance X – not in compliance NA – not applicable

Assessing NEW (a tank that will be used for storage or treatment and for which installation has commenced after July 14, 1986, except for variance purposes) tank systems:

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
5.		Has independent PE assess all existing tanks- 262.17(a)(2)→265.192(a)	
6.		Includes in assessment the following: design standards, characteristics of waste, corrosion protection (completed by corrosion expert), tightness prior to use- 262.17(a)(2)→265.192(a)(1-5)	
7.		Has independent PE perform installation inspection- 262.17(a)(2)→265.192(b)	
8.		Maintains certification statements of design and inspection- 262.17(a)(2)→265.192(g)	

v - in compliance X – not in compliance NA – not applicable

#	REGULATORY REQUIREMENTS	Tank # ___	Tank # ___	Tank # ___	Tank # ___	Tank # ___
9.	Labels tanks “Hazardous Waste”- 262.17(a)(5)(ii)(A)					
10.	Labels tanks with an indication of the nature of the hazard- 262.17(a)(5)(ii)(B)					
11.	Maintains inventory logs, monitoring equipment, or other records to demonstrate that hazardous waste has been emptied within 90 days (batch process), OR provides means to demonstrate that estimated volumes of hazardous waste entering the tank daily exit within 90 days (continuous process)- 262.17(a)(5)(ii)(C)					

, Lead Inspector

Attachment _____ Page _____ of _____

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#	REGULATORY REQUIREMENTS	Tank #	Tank #	Tank #	Tank #	Tank #
12.	Has inventory logs or records to demonstrate 90-day compliance on site, and is readily available for inspection- 262.17(a)(5)(ii)(D)					
13	Installs secondary containment (sec. cont.) for all tanks in the following categories: new; installed after July 14, 1986; over 15 years old, or unknown age in facility over 15 years old; repaired, replaced, or reinstalled after July 14, 1986- 262.17(a)(2)→265.193(a)					
14	Constructs sec. cont. material of impervious and compatible material- 262.17(a)(2)→265.193(c)(1)					
15.	Has sec. cont. capable of preventing failure due to settlement, compression, or uplift- 262.17(a)(2)→265.193(c)(2)					
16.	Puts ancillary equipment in sec. cont., except aboveground piping, welded flanges, joints, connections, sealless or magnetic pumps, pressurized piping with automatic shutoff devices, if inspected daily- 262.17(a)(2)→265.193(f)					
17.	Installs leak detection system for sec. cont., capable of detecting leaks within a 24-hr. period- 262.17(a)(2)→265.193(c)(3)					
18.	Removes spilled or leaked waste and precipitation from sec. cont. within 24 hrs. or as soon as possible- 262.17(a)(2)→265.193(c)(4)					
19.	Has sec. cont. capable of containing 100% of largest tank- 262.17(a)(2)→265.193(e)(1)(i)					
20.	Installs and operates spill & overflow prevention controls (check valves, dry disconnects, level sensing devices, high-level alarms, automatic feed cutoffs, maintenance of sufficient freeboard, etc.)- 262.17(a)(2)→265.194(b)					
21.	Uses tank compatible with waste or treatment method- 262.17(a)(2)→265.194(a)					
22.	Does not put incompatible wastes in the same tank- 262.17(a)(2)→265.199(a)					
23.	Treats and accumulates ignitable/reactive waste per NFPA's buffer zone requirements- 262.17(a)(2)→265.198(b)					
24.	Treats and accumulates ignitable/reactive wastes so as to prevent ignition- 262.17(a)(2)→265.198(a)					

, Lead Inspector

Attachment _____ Page _____ of _____

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#	REGULATORY REQUIREMENTS	Tank #	Tank #	Tank #	Tank #	Tank #
25.	Inspects daily the following: spill/overflow equipment, aboveground portions of tank system, sec. cont. & data from monitoring equipment- 262.17(a)(2)→265.195(a)					
26.	Inspects cathodic protection systems annually and impresses current systems every 2 months- 262.17(a)(2)→265.195(b)					

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: YES NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: YES NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: YES NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

, , : RCRA ID#

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: YES NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Person responsible for tank area: _____

Area noted on map or diagram: YES NO

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

APPENDIX 1-7. VISUAL REVIEW

D. TREATMENT, STORAGE, AND DISPOSAL FACILITY (TSDF) REQUIREMENTS

Requirements for interim status facilities (40 CFR Part 265) are used for all citations in **APPENDIX 1-7.D**. For permitted TSDFs, cite the parallel requirement from the facility permit.

D.1. Required Response Equipment

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Operates to minimize possibility of emergency- 265.31	
2.		Provides an internal communications or alarm system- 265.32(a)	
3.		Provides device available for and capable of summoning emergency assistance- 265.32(b)	
4.		Provides adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)- 265.32(c)	
5.		Provides adequate water supply for fire control equipment- 265.32(d)	
6.		Tests and maintains communication and emergency equipment- 265.33	
7.		Has device immediately available for and capable of summoning emergency assistance when waste is being handled or only one person is present- 265.34	

√ - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

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D.2. Container Storage Area

1. Name _____
(Complete one form per storage area)
2. Type of accumulation: I.S. Permit
3. I.S./Permitted capacity: _____

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
4.		Uses containers that are in good condition- 265.171	
5.		Uses containers that are compatible with waste- 265.172	
6.		Keeps containers closed- 265.173(a)	
7.		Does not open, handle, or manage containers in a manner to cause them to leak- 265.173(b)	
8.		Separates containers of incompatible wastes and/or incompatible wastes and materials, or protects them from each other- 265.177	
9.		Keeps containers of ignitable/reactive waste more than 50 feet from property line- 265.176	
10.		Provides adequate aisle space for type of container management and emergency equipment used- 265.35	
11.		Inspects storage area weekly- 265.174	
13.		Inspects loading/unloading areas daily (when in use)- 265.15(a)(4)	
14.		Provides controlled entry, 24-hr. surveillance, or barrier- 265.14(b)	
15.		Posts "Danger Unauthorized Personnel Keep Out" signs- 265.14(c)	
16.		Posts "No Smoking" signs- 265.17(a)	
17.		Marks containers with "Hazardous Waste;" waste codes; nature of the hazard, DOT, OSHA or NFPA placard; and with accumulation start date- 268.50(a)(2)	
18.		Does not store LDR wastes for longer than 1 yr. without adequate justification- 268.50(c)	

√ - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

, Lead Inspector

Attachment _____ Page _____ of _____

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19. Container inventory: Actual Count Approximate count

Waste Type	Oldest Date	Volume per Container	# of Containers	Total Volume

Total Quantity (pounds, gallons, etc.): _____

20. How were container volumes verified? _____

21. Container management area location noted on map or diagram: YES NO

22. Notes/Observations: _____

D.3. Tank Storage Area(s)

1. Total number of tanks at facility: _____
2. I.S./Permitted total capacity: _____

Assessing EXISTING tanks (tanks used for storage or treatment and that are in operation, or for which installation commenced on or prior to July 14, 1986) without secondary containment:

#	v/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
2.		Has employed independent PE to assess all existing tanks- 265.191(a)	
3.		Assesses existing systems that store material which became hazardous waste subsequent to July 14, 1986- 265.191(c)	
4.		Includes in assessment the following: design standards, characteristics of waste, existing corrosion protection, age, leak test for non-enterable tanks, and ancillary equipment- 265.191(b)	

v - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

Assessing NEW (a tank that will be used for storage or treatment and for which installation has commenced after July 14, 1986, except for variance purposes) tank systems:

#	v/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
5.		Has independent PE assess all existing tanks- 265.192(a)	
6.		Includes in assessment the following: design standards, characteristics of waste, corrosion protection (completed by corrosion expert), tightness prior to use- 265.192(a)(1-5)	
7.		Has independent PE perform installation inspection- 265.192(b)	
8.		Maintains certification statements of design and inspection- 265.192(g)	

v - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

#	REGULATORY REQUIREMENTS*	Tank # ___	Tank # ___	Tank # ___	Tank # ___	Tank # ___
9.	Installs secondary containment (sec. cont.) for all tanks in the following categories: installed after July 14, 1986; over 15 years old, or unknown age in facility over 15 years old; repaired, replaced, or reinstalled after July 14, 1986- 265.193(a)					
10.	Constructs sec. cont. material of impervious and compatible material- 265.193(c)(1)					
11.	Has sec. cont. capable of preventing failure due to settlement, compression, or uplift- 265.193(c)(2)					

, Lead Inspector

Attachment _____ Page _____ of _____

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#	REGULATORY REQUIREMENTS*	Tank #	Tank #	Tank #	Tank #	Tank #
13.	Puts ancillary equipment in sec. cont., except aboveground piping, welded flanges, joints, connections, sealless or magnetic pumps, pressurized piping with automatic shutoff devices, if inspected daily- 265.193(f)					
14.	Installs leak detection system for sec. cont., capable of detecting leaks within a 24-hr. period- 265.193(c)(3)					
15.	Removes spilled or leaked waste and precipitation from sec. cont. within 24 hrs. or as soon as possible- 265.193(c)(4)					
16.	Has sec. cont. capable of containing 100% of largest tank- 265.193(e)(1)(i)					
17.	Uses tank compatible with waste or treatment method- 265.194(a)					
18.	Does not put incompatible wastes in the same tank- 265.199(a)					
19.	Treats and accumulates ignitable/reactive waste per NFPA's buffer zone requirements- 265.198(b)					
20.	Treats and accumulates ignitable/reactive waste per NFPA's buffer zone requirements- 265.198(b)					
21.	Treats and accumulates ignitable/reactive wastes so as to prevent ignition- 265.198(a)					
22.	Inspects daily the following: spill/overflow equipment, aboveground portions of tank system, sec. cont. & data from monitoring equipment- 265.195(a)					
23.	Inspects cathodic protection systems annually and impresses current systems every 2 months- 265.195(b)					
24.	Description of contents, quantity of each hazardous waste received, and the date each period of accumulation begins (may be in operating record- 268.50(a)(2)(ii)					

V - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: I.S. Permit Area noted on map or diagram: YES NO

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

, Lead Inspector

Attachment _____ Page _____ of _____

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Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: I.S. Permit Area noted on map or diagram: YES NO

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: I.S. Permit Area noted on map or diagram: YES NO

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: I.S. Permit Area noted on map or diagram: YES NO

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank # _____ – Name & location of tank: _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: I.S. Permit Area noted on map or diagram: YES NO

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

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APPENDIX 1-7. VISUAL REVIEW

E. USED OIL

Complete **APPENDIX 1-4** to describe used oil waste streams.

E.1. Prohibitions

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Complies with all 40 CFR 264 or 265 requirements for surface impoundments and waste piles utilized to manage used oil- 279.12(a)	
2.		Does not utilize used oil as a dust suppressant- 279.12(b)	
3.		Burns off-specification used oil fuel for energy recovery only in industrial furnaces, industrial boilers, utility boilers, used oil-fired space heaters, or hazardous waste incinerators identified in 40 CFR Part- 279.12(c)(1-3)	

v - in compliance X – not in compliance NA – not applicable

Used oil activities:

<input type="checkbox"/> Generator	Complete this section
<input type="checkbox"/> Collection Centers and Aggregation Points (40 CFR 279 Subpart D)	Complete this section
<input type="checkbox"/> Transporters and Transfer Centers (40 CFR 279 Subpart E)	Complete Appendix 2-5.A
<input type="checkbox"/> Processors and Re-Refiners (40 CFR 279 Subpart F)	Complete Appendix 2-5.B
<input type="checkbox"/> Burners Who Burn Off-Specification Used Oil for Energy Recovery (40 CFR 279 Subpart G)	Complete Appendix 2-5.C
<input type="checkbox"/> Used Oil Fuel Marketers (40 CFR Subpart H)	Complete Appendix 2-5.D

E.2. Standards for Used Oil Generators and Used Oil Collection/Aggregation Points

For collection centers and aggregation points, citation is 279.30(b), 279.31(b)(1), or 279.32(b) referencing citation below.

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		If not a VSQG, manages mixtures of hazardous waste and used oil according to 279.10(b)- cite 262.11 for deficiency	
2.		Rebuts the presumption that listed hazardous waste has been mixed with used oil for used oil containing more than 1,000 ppm total halogens- cite 262.11 for deficiency	
3.		Stores used oil only in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265- 279.22(a)	
4.		Stores used oil in containers and ASTs that are (1) in good condition and (2) have no visible leaks- 279.22(b)(1) and (b)(2)	

, Lead Inspector

Attachment _____ Page _____ of _____

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#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
5.		Labels containers and ASTs "Used Oil"- 279.22(c)(1)	
6.		Labels or marks fill pipes used for underground tanks as "Used Oil"- 279.22(c)(2)	
7.		Upon detection of a release, (1) stops the release, (2) contains the release, (3) cleans up and manages used oil and other materials, and (4) repairs or replaces the containers or tanks prior to returning them to service, if necessary- 279.22(d)(1) through (d)(4)	
8.		Burns only its own or household DIY used oil- go to APPENDIX 2-5.C for deficiency	
9.		Burns used oil in a < 0.5M BTU/hr space heater that is vented to ambient air- go to APPENDIX 2-5.C for deficiency	
10.		If no tolling agreement, ensures that used oil is transported only by a transporter that has obtained an EPA ID number- 279.24	
11.		If tolling agreement is in place, includes in the contract the following: (1) type of used oil and frequency of shipments, (2) requirement that the vehicle transporting the used oil to and from generator is owned by the processor/re-refiner, and (3) requirement that the reclaimed oil will be returned to generator- 279.24(c)(1) through (c)(3)	
12.		Transports its own used oil in its own vehicles, in quantities less than 55 gallons at a time, to a recognized used oil collection center- 279.24(a)/go to APPENDIX 2-5.A FOR DEFICIENCY	
13.		Transports its own used oil in its own vehicles, in quantities less than 55 gallons at a time, to an aggregation point owned by generator- 279.24(b)/go to APPENDIX 2-5.A FOR DEFICIENCY	

v - in compliance X – not in compliance NA – not applicable

E.3. Standards for Used Oil Collection/Aggregation Points

#	v/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Has registered with or received a license from the local or state government- 279.31(b)(2)	

v - in compliance X – not in compliance NA – not applicable

, Lead Inspector

Attachment _____ Page _____ of _____

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APPENDIX 1-7. VISUAL REVIEW

F. UNIVERSAL WASTE (UW)

Complete **APPENDIX 1-4** to describe universal waste streams.

Universal waste activities:

<input type="checkbox"/> Small Quantity Handler (less than 5,000 kg accumulated at any time)	Complete this section
<input type="checkbox"/> Large Quantity Handler (less than 5,000 kg accumulated at any time)	Complete Appendix 2-6.A
<input type="checkbox"/> Transporters (40 CFR 273 Subpart D)	Complete Appendix 2-6.B
<input type="checkbox"/> Destination Facilities (40 CFR 273 Subpart E)	Complete Appendix 2-6.C

F.1. General

Note: Facilities that are not VSQGs that transport universal waste to a universal waste handler or destination facility must comply with all requirements for universal waste transporters (complete Appendix 2-6.B).

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Does not dispose of universal waste on site- 273.11(a)	
2.		Does not dilute or treat universal waste, except for responding to releases per 273.17 or by managing specific wastes per 273.13 (waste management)- 273.11(b)	
3.		Does not accumulate universal waste for longer than 1 year- 273.15(a)	
4.		Demonstrates the length of time that the universal waste has been accumulated- 273.15(c)	
5.		Trains employees responsible for management of universal waste in proper handling and emergency procedures- 273.16	
6.		Immediately contains all releases of universal wastes and other residues from universal wastes- 273.17(a)	
7.		Makes a hazardous waste determination on any materials resulting from a release or from any materials (such as electrolytes) generated from management of universal waste- cite 262.11 for deficiency	
8.		If a VSQG facility, transports universal waste to a universal waste handler or destination facility- 262.14(a)(5)(vii)	

√ - in compliance X – not in compliance NA – not applicable

F.2. Universal Waste Lamps

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Keeps universal waste lamps in containers or packages that are closed, structurally sound, compatible, and lack evidence of leakage, spillage, or damage that could cause leakage- 273.13(d)(1)	
2.		Immediately contains universal waste lamps that show evidence of breakage or damage- 273.13(d)(2)	
3.		Labels containers of universal waste lamps "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)"- 273.14(e)	

√ - in compliance X – not in compliance NA – not applicable

F.3. Universal Waste Batteries

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Immediately contains universal waste batteries that show any evidence of leakage or other damage- 273.13(a)(1)	
2.		Labels individual batteries or their containers "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"- 273.14(a)	

√ - in compliance X – not in compliance NA – not applicable

F.4. Universal Waste Mercury-Containing Equipment (MCE)

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Immediately contains universal waste MCE that show any evidence of leakage or other damage- 273.13(c)(1)	
2.		Removes mercury ampules from MCE only with all health and safety requirements in place- 273.13(c)(2)(i) through (2)(vi)	
3.		Stores mercury ampule from MCE in closed containers, packed to prevent breakage- 273.13(c)(2)(vii) through (2)(viii)	
4.		Labels individual MCE or their containers "Universal Waste-Mercury Containing Equipment," or "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment"- 273.14(d)(1)	
5.		Labels individual MCE thermostats or their containers "Universal Waste-Mercury Thermostat(s)," or "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"- 273.14(d)(2)	

√ - in compliance X – not in compliance NA – not applicable

, Lead Inspector

Attachment _____ Page _____ of _____

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F.5. Universal Waste Pesticides

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Keeps universal waste pesticides in containers that are closed, structurally sound, compatible, and lack evidence of leakage, spillage, or damage that could cause leakage- 273.13(b)(1)	
2.		If universal waste pesticides are managed in a tank, ensures that tank meets requirements of 40 CFR 265 Subpart J- 273.13(b)(1)	
3.		Overpacks universal waste pesticides in noncompliant containers in a container compliant with 273.13(b)(1)- 273.13(b)(2)	
4.		Keeps universal waste pesticides in a transport vehicle/vessel that is closed, structurally sound, compatible, and lacks evidence of leakage, spillage, or damage which could cause leakage- 273.13(b)(4)	
5.		Labels recalled universal waste pesticides (1) with the original product label or appropriate DOT label as identified in 49 CFR 172, and (2) “Universal Waste-Pesticide(s)” or “Waste-Pesticide(s)”- 273.14(b)(1) and (b)(2)	
6.		Labels unused pesticide products with at least one of the following: (i) the label that was on the product when purchased, if still legible; (ii) the appropriate label required under DOT regulation; or (iii) another label prescribed or designated by the state waste pesticide collection program- 273.14(c)(1)(i) through (1)(iii)	
7.		Labels unused pesticide products with “Universal Waste- Pesticide(s)” or “Waste-Pesticide(s)”- 273.14(c)(1)(2)	

√ - in compliance X – not in compliance NA – not applicable

, Lead Inspector

Attachment _____ Page _____ of _____

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APPENDIX 1-8. EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? Yes No

Identified/verified that violations from previous inspection were corrected (if applicable)

Addressed all unresolved inspection-related issues

Summarized findings and observations for the facility representatives

NOV issued? Yes No Violations identified and explained, including circumstances, location, and regulations

Explained importance of a timely (14-day) and adequate response

Explained that findings and observations are based on your current knowledge of RCRA, and that final findings may differ

Explained that compliance officer will make final decisions and that all compliance questions should be directed toward the compliance officer

Explained that recommendations provided are for informational purposes only and DO NOT require specific actions

Provided facility with CBI form

Prepared Document Receipt form

Provided compliance assistance materials

3. Specific information requested from facility? Yes No

4. Facility appears to have awareness of RCRA regulations? Yes No

5. Facility has its own environmental staff? Yes No

6. Facility has copy of applicable regulations? Yes No

7. Attitude and demeanor of facility representative(s); OK Not OK

8. Notes/Observations: _____

, Lead Inspector

Attachment _____ Page _____ of _____

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