

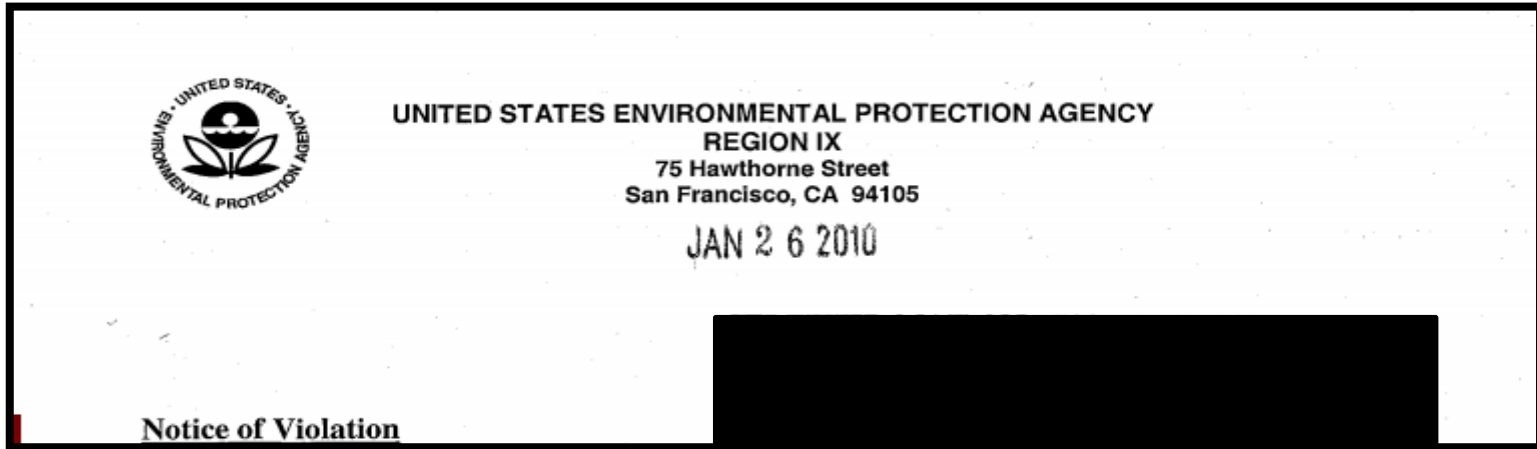


Standard for Hazardous Waste Management, Compliance Checklist

Sean K. Grady, CHMM | Vice President-Principal



Applicability



- Does the facility generate hazardous waste, as defined in §261?
- Is the facility permitted to store it hazardous waste for > 90 days?
- Is the facility a conditionally exempt small quantity generator (CESQG)?
 - CESQG – generates less <220 lb/month and accumulates <2,200 kg total OR generates <2.2 kg/month acute hazardous waste
 - SQG – generates >220 lbs but <2,200 lbs non acute hazardous waste and must be offsite within 180 days unless there is an exemption met (§262.34(d))
 - LQG – generates >2,200 lbs non acute hazardous waste and must be offsite within 90 days unless extension is granted (§262.34(b))
 - If you generate SQG and LQG quantities, you will need an EPA ID#.



Characterization

- Any changes since the facility last characterized their wastestreams?
 - New products?
 - Change in process?
- Re-analyzed new streams or streams that may have changed?
- Have the results of analyses been kept on file for at least 3 years?
 (§261.40(c))

Waste Characterization Form

1. Wastestream Name: _____
2. Process Generating: _____
3. Matrix (Solid/Liquid/Gas/Sludge/Other): _____
4. Classification: _____
5. Quantity: _____
6. Container: _____

Recycling

Does your facility recycle hazardous waste?

Is your hazardous waste:

- Burned for energy? §261.1(a)(2)
- Reclaimed for precious metals? §261.1(a)(2)
- Reclaimed for ethyl alcohol? §261.1(a)(3)
- Scrap metal? §261.1(a)(3)
- Recycled for fuels? §261.1(a)(3)
- Reclaimed in a foreign country? §261.1(a)(3)

If none of these, then the hazardous waste is subject to the regulations to follow.



90 day Accumulation Area

§262.34 and §265 Subpart I

- Accumulation of hazardous waste in tanks, containment building, or wood preservative drip pads?
 - See standards §262.34(a)(1)(ii)-(iv), in §265 Subpart J and D as applicable.
- Containers must be:
 - Properly labeled with “Hazardous Waste” and date accumulation began (must be visible)
 - Closed and in good condition (no leaking, corrosion, or deterioration)
 - Compatible with hazardous waste (corrosive in metal vs poly)
 - Segregated from other containers if incompatible (corrosive and oxidizer)
 - Properly washed before use if previously contained incompatible
 - Reasonably spaced between other rows of drums
 - Stored ≥50 feet from property line if ignitable and reactive (only LQG)
 - No more than 2 high on pallets (§265.173(b))
 - Inspected once a week. (§265.174)
 - Results recorded on an inspection form.
 - Inspection form addresses all of the above.
- Is the accumulation area under 24 hour surveillance or controlled entry?
- Is the accumulation area clearly delineated and/or sign posted?



Storage Inspection Checklist

90 day Accumulation Area Continued

§262.34 and §265 Subpart I



Waste Storage Inspection Checklist

PROJECT INFORMATION

PROJECT NAME: _____ PROJECT NO.: _____
 SITE LOCATION: _____ PROJECT MGR.: _____
 INSPECTION DATE/Time: _____ INSPECTOR: _____

GENERATOR INFORMATION

GENERATOR NAME: _____
 EPA ID NO.: _____ GENERATOR STATUS: LQG SQG CESQG
 ADDRESS: _____ CITY/ST: _____ ZIP: _____
 PHONE: _____ CONTACT NAME: _____

STORAGE AREA INSPECTION

| | <u>YES</u> | <u>NO</u> | <u>N/A</u> |
|---|------------|-----------|------------|
| • IS STORAGE AREA SECURED FROM UNAUTHORIZED PERSONNEL? | _____ | _____ | _____ |
| • IS STORAGE AREA ACCESSIBLE IN THE EVENT OF AN EMERGENCY? | _____ | _____ | _____ |
| • IS THERE APPROPRIATE SPILL CONTAINMENT / DECONTAMINATION EQUIPMENT ACCESSIBLE? | _____ | _____ | _____ |
| • IS EQUIPMENT PROPERLY MAINTAINED AND IN WORKING CONDITION? | _____ | _____ | _____ |
| • IS THERE A COMPATIBLE FIRE EXTINGUISHER ACCESSIBLE, PROPERLY MAINTAINED AND IN WORKING CONDITION? | _____ | _____ | _____ |
| • IS THERE A SOURCE OF WATER NEARBY FOR FIRE-FIGHTING EQUIPMENT? | _____ | _____ | _____ |
| • IS THERE AN INTERNAL ALARM / COMMUNICATION SYSTEM AVAILABLE? | _____ | _____ | _____ |
| • IS THERE AN EMERGENCY CONTACT TELEPHONE NUMBER POSTED? | _____ | _____ | _____ |
| • ARE CONTAINERS IN GOOD CONDITION, NOT DETERIORATED NOR LEAKING? | _____ | _____ | _____ |
| • ARE THE WASTES BEING STORED COMPATIBLE WITH CONTAINERS? | _____ | _____ | _____ |
| • ARE CONTAINERS CLOSED UNLESS WASTE IS CURRENTLY BEING ADDED TO THEM? | _____ | _____ | _____ |
| • IF WASTES STORED IN THE CONTAINERS ARE RCRA-HAZARDOUS, ARE CONTAINERS PROPERLY MARKED WITH THE WORDS "HAZARDOUS WASTE"? | _____ | _____ | _____ |
| • DO CONTAINERS HAVE AN ACCUMULATION START DATE CLEARLY MARKED ON THE LABEL? | _____ | _____ | _____ |
| • ARE THE CONTENTS AND / OR D.O.T. PROPER SHIPPING NAMES CLEARLY MARKED ON THE LABEL? | _____ | _____ | _____ |
| • IS GENERATOR'S INFORMATION (i.e. EPA ID NO., PHONE NO.) CLEARLY MARKED ON THE LABEL? | _____ | _____ | _____ |
| • ARE CONTAINERS D.O.T. / U.N. APPROVED CONTAINERS? | _____ | _____ | _____ |
| • IF REQUIRED, ARE CONTAINERS PLACED ON OR IN A SECONDARY CONTAINMENT SYSTEM (i.e. CONCRETE BUNKER, SPILL-CONTAINMENT PAD)? | _____ | _____ | _____ |
| • IS A 3 FOOT OR MORE AISLE SPACE PROVIDED BETWEEN CONTAINERS? | _____ | _____ | _____ |



Satellite Accumulation

- Containers under control of operator or near the point of generation? (§262.34(c))
- Containers closed and in good condition? (§262.34 c)(1)(ii)
- Waste compatible with container? (§262.34 c)(1)(i))
- Containers marked hazardous waste? (§262.34 c)(1)(ii))?
- Maximum Quantities in Satellite Accumulation
 - Hazardous Waste – 55 gallons
 - Acutely hazardous waste – 1 quart
- If over 55 gallons/1quart – is the container labeled with date the amount reached max? (§262.34 c (2))
- If date is present, is it over the 3 day maximum? (§262.34 c (2))



Manifests

- Is a manifest completed for every shipment? (§262.20 (a))
- Is the copy retained legible?
- Is it filled out according to the instructions on the manifest? (§262.20 (a))
- Is the manifest of the receiving state used?
- Has the retained copy been signed by the transporter and disposal facility? (§262.23 (a))
- Retained for ≥ 3 years? (§262.40 (a))

Please print or type. (Form designed for use on 8 1/2" x 11" (216x279) typewriter.)

Form Approved. OMB No. 2050-0029

1. Generator ID Number: **IND599654125** 2. Page 1 of 1 3. Emergency Response Phone: **800-424-9300** 4. Manifest Tracking Number: **009421026 JJK**

5. Generator's Name and Mailing Address: **ABC Company, 123 Memory Lane, Indianapolis, IN 46123** Generator's Site Address (if different than mailing address): _____

6. Transporter 1 Company Name: **Jon Doe Transportation Inc.** U.S. EPA ID Number: **IND000123789**

7. Transporter 2 Company Name: _____ U.S. EPA ID Number: _____

8. Designated Facility Name and Site Address: **County Landfill, LLC, 456 Dump Avenue, Danville, IN 46118** U.S. EPA ID Number: **IND110254685**

Facility's Phone: (317) 987-6543

| 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes |
|--------|--|----------------|------|--------------------|-------------------|-----------------|
| | | No. | Type | | | |
| X | NA3077, Hazardous Waste, Solid, N.O.S. (Lead), 9, PG III | 001 | DM | 400 | P | D008 |
| | | | | | | |
| | | | | | | |
| | | | | | | |

14. Special Handling Instructions and Additional Information: **1. Profile #569855, ERG #171**

15. GENERATOR/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled, stored, and in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste identification statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator/Officer's (Printed) Name: **Sean Grady "Agent of ABC Company"** Signature: *Sean Grady* Month: **10** Day: **31** Year: **14**

16. International Shipments: Import to U.S. Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____

17. Transporter Acknowledgment of Receipt of Materials: Transporter 1 (Printed) Name: **Jon Doe** Signature: *Jon Doe* Month: **10** Day: **31** Year: **14**

Transporter 2 (Printed) Name: _____ Signature: _____ Month: _____ Day: _____ Year: _____

18. Discrepancy: 18a. Discrepancy Indication: Quantity Type Residue Partial Rejection Full Rejection

18b. Discrepancy Indication: _____

18c. Alternate Facility (or Generator): _____ Manifest Reference Number: _____ U.S. EPA ID Number: _____

Facility's Name: _____

18d. Signature of Alternate Facility (or Generator): _____ Month: _____ Day: _____ Year: _____

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems):

| | | | |
|----------|----------|----------|----------|
| 1. _____ | 2. _____ | 3. _____ | 4. _____ |
|----------|----------|----------|----------|

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18c. Printed Name: **Mark Smith** Signature: *Mark Smith* Month: **10** Day: **31** Year: **14**

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)



Manifests continued

Large Quantity Generator:

- Received copies of the manifests signed by TSDf for shipments made >35 days?
 - If no, has the facility followed up with TSDf?
- Received copies of the manifests signed by TSDf for shipments made >45 days?
 - If no, has an exception report been submitted? (§262.42(a))

Small Quantity Generator:

- Received copies of the manifests signed by TSDf for shipments made >60 days?
 - If no, has the facility submitted to the specified agency a copy of the manifest that was not signed by TSDf, together with an indication that it has not received a signed copy? (§262.42(b))

Packaging, Labeling, Marking, & Placarding

- Are the containers:
 - Packaged in accordance with 49 CFR 173, 178, and 179 (§262.30)?
 - Labeled and marked in accordance with 49 CFR 172 and specifically with §172.304 (§262.31 & 32)?
 - Placarded in accordance with 49 CFR 172 Subpart F (§262.33)?



Waste Minimization Plan

WASTE MINIMIZATION/POLLUTION
PREVENTION PLAN

Company Name

Facility Name

City, State



6520 Corporate Drive
Indianapolis, IN 46278

Is there a Waste Minimization Plan in place at your facility?

If yes, does it include:

- Top management support
- Characterization of waste generation
- Management costs
- Periodic assessments of the effectiveness of the plan
- Technology transfer
- Is it written down?





Preparedness and Prevention

40 CFR 262.34(a)(4)

- Does the facility have the following items?
 - Communication/Alarm System
 - Telephone or Radio for summoning outside emergency assistance
 - Fire, Spill Control and Decontamination equipment
 - Sufficient water for fire hoses

- Is the above equipment tested and maintained to insure its proper operation? (§265.33)

- Do all personnel involved in handling hazardous waste have immediate access to an alarm or communication device? (§265.34)

- Does the facility maintain enough aisle space for the unobstructed movement of personnel and emergency equipment? (§265.5)





Preparedness and Prevention continued...

40 CFR 262.34(a)(4)

- Has the facility made the following arrangements appropriate for the type of hazardous waste handled?
 - ❑ Familiarize the emergency authorities with layout of the facility, hazardous waste, emergency routes, etc. (§265.37(a(1)))?
 - ❑ Designate a primary emergency authority, if necessary (§265.37(a)(2))?
 - ❑ Reach agreements with emergency response teams, contractors, or equipment suppliers? (§265.37(a)(3))
- If an authority has declined to enter into arrangement with the facility, this must be documented (§265.37(b)).



Contingency Plan

40 CFR 262.34(a)(4)

LQG are required to have a contingency plan (§265.51). It can be incorporated into the facility's SPCC plan (§265.52(b)) or as part of an Integrated Contingency Plan (ICP).

Does the contingency plan include:

- Actions to take in an emergency (§265.52(a))?
 - Arrangements with the emergency authorities (§265.52(c))?
 - An up-to-date list of the names, addresses, and phone numbers (office & home) of all persons qualified to act as the emergency coordinator (§265.52(d))?
 - An up-to-date list of the emergency equipment, including descriptions, locations, and its capabilities (§265.52(e))?
 - An evacuation plan (§265.52(f))?
-
- Have copies been submitted to the emergency authorities (§265.53(b))?
 - Has the plan been amended whenever (§265.34):
 - Applicable regulations change?
 - Plan fails in an emergency?
 - Facility design or operation changes?
 - List of emergency coordinators changes?
 - Or list of emergency equipment changes?

Contingency Plan continued...

40 CFR 262.34(a)(4)

LQG Responsibilities

Are all persons listed to act as emergency coordinator thoroughly familiar with the requirements and responsibilities for a coordinator defined in §265.55 and §265.56?

Is at least one employee available or on call at all times to act as the emergency coordinator? (§265.55)

Hazardous Waste Contingency Plan (HWCP)

ABC Company

Prepared for:
ABC Company

Prepared by:
GHD Services Inc.
6520 Corporate Drive
Indianapolis, IN 46278
www.ghd.com

Emergency Equipment

40 CFR 265.52 (e) requires that emergency equipment at the Facility be listed. Completion of the following Emergency Equipment Inventory Table meets this requirement.

Emergency Equipment Inventory Table

Fire Extinguishing Systems/ Equipment

| Equipment Type | Location | Description |
|---|----------|-------------|
| <input type="checkbox"/> Automatic Fire Sprinkler Systems | | |
| <input type="checkbox"/> Fire Alarm Boxes/Stations | | |
| <input type="checkbox"/> Fire Extinguishers (describe) | | |
| <input type="checkbox"/> Fire Hydrants | | |
| <input type="checkbox"/> Foam Systems (describe) | | |
| <input type="checkbox"/> Other (describe) | | |

Spill Control Equipment and Decontamination Equipment

| Equipment Type | Location | Description |
|--|----------|-------------|
| <input type="checkbox"/> Absorbents (describe) | | |

Evacuation Plan

Evacuation Plan Procedures

The evacuation signal shall be routinely communicated to all Terminal/Facility personnel and reviewed as part of **daily/weekly/monthly** safety meetings. Please refer to the facility diagram (Figure 1.3) for evacuation routes and muster areas.

To ensure the personal safety of all employees, including contractors, vendors and visitors, facility personnel shall adhere to the following evacuation procedures.

1. Assess the Situation

The Emergency Coordinator shall assess the situation to the extent that time and safety permits when initiating an evacuation. The following shall be taken into account:

- Locations of stored materials:

Contingency Plan Continued...

SQG Responsibilities

Is at least one person on call at all times to act as the emergency coordinator? (§262.34 (d)(5)(i))

Is this person aware of the responsibilities as described in §262.34(d)(5)(iv)?

Do the telephones in the facility have posted next to them:

- Name and number of emergency coordinator(s)?
- Location of fire extinguisher(s) and spill control material(s) and the fire alarm?
- Telephone number of the fire department?

Are all employees familiar with proper waste handling and emergency procedures relevant to their responsibilities? (§262.34 (d)(5)(iii))





RCRA Training

40 CFR 262.34(a)(4)

For LQGs:

Does the facility have a training program for effective response to emergencies that includes (§265.16(a)(3)):

- Procedures for using, inspecting, repairing, etc., emergency and monitoring equipment?
- Key parameters for automatic waste feed cut-offs?
- Communication/alarm systems?
- Response to emergencies?
- Shutdown procedures?

Is this program directed by a person trained in hazardous waste management procedures? And does it include instruction relevant to the positions occupied by those requiring training? (§265.16(a)(2))

Has each person requiring training completed it within 6 months of their assignment to their position? (§265.16(a)(2))

Has each person requiring training undertaken annual reviews of their training? (§265.16(c))

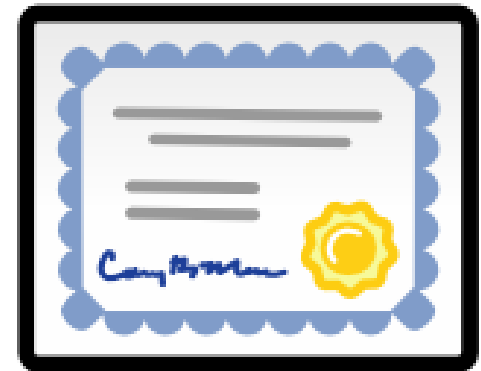
RCRA Training continued...

Does the facility have records of:

- Each job title/position related to hazardous waste management, and the name of the employee filling the job?
- A job description for each position?
- A description of the introductory and continuing training required for each position? (§265.16(d)(3))
- Successful completion by each employee of training? (§265.16(d)(4))

Have the records been kept for ≥ 3 years after the employee leaves the facility?

For SQGs, are all employees thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities? (§262.34(d)(5)(iii))



DOT Training

49 CFR 172.700

Does the facility have its hazardous waste transported offsite?

Does the facility have a training program for all hazmat employees who affect the safety of the transportation of hazmat (49 CFR 172.702(a))?

Do the records include:

- HazMat employee's name
- Completion date of the most recent training
- Copy or a description of the training materials
- Name and address of the HazMat trainer
- Certification that the employee has been trained and tested (49 CFR 172.704(d))

Do the training materials include the following modules:

- General awareness/Familiarization
- Function specific training
- Safety
- Driver Training (49 CFR 172.704(a))



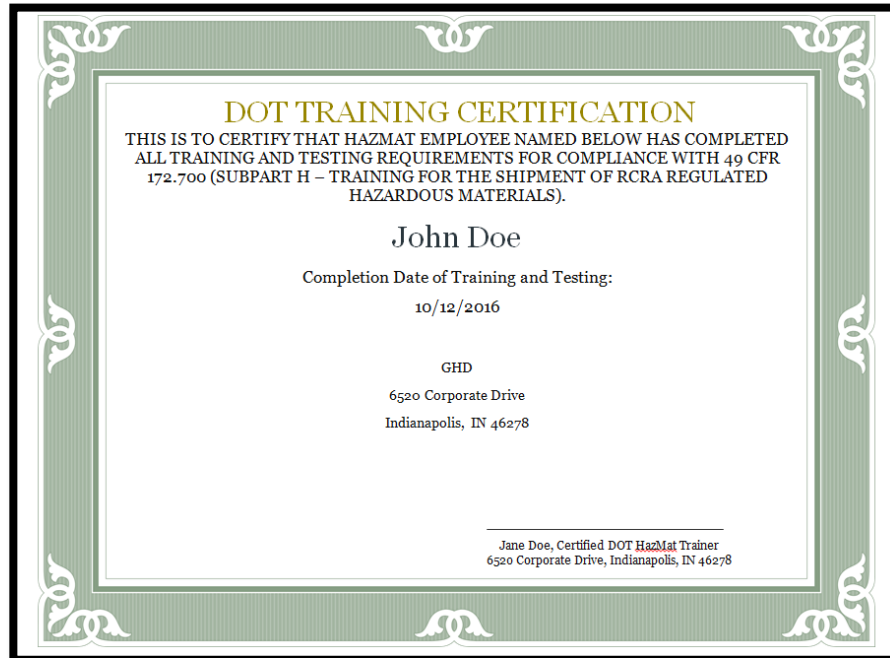
DOT Training continued

49 CFR 172.700

Has every HazMat employee undergone initial training or recurrent training in the past three years? (49 CFR 172.704(a))

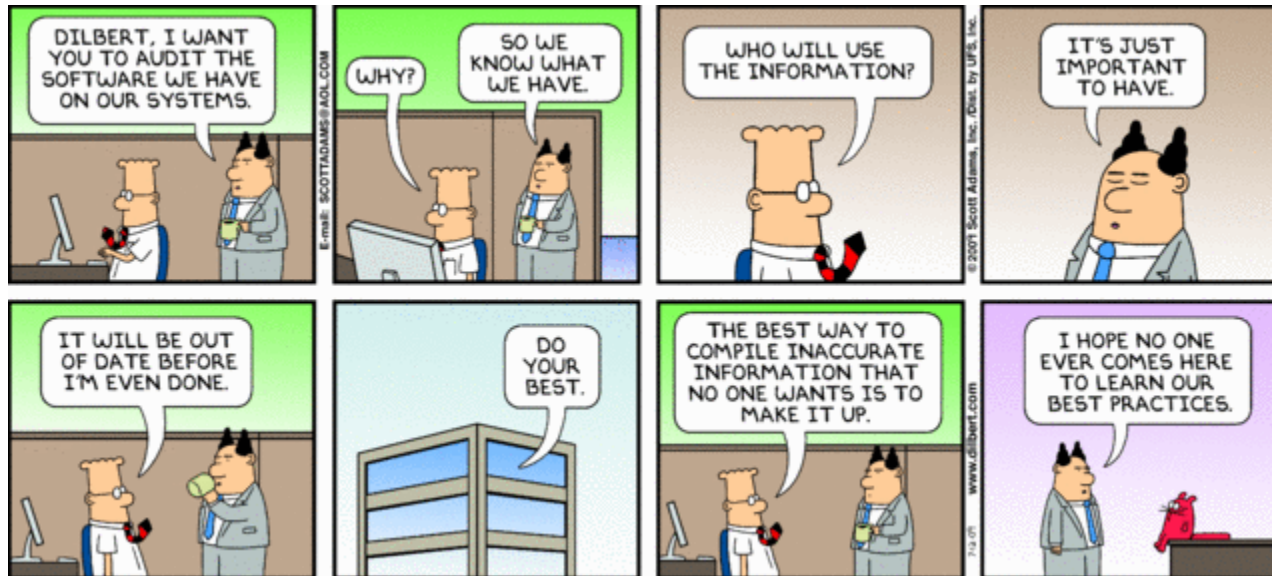
If no, have the employees not yet trained been working as HazMat employees for less than 90 days and do they work only under the supervision of a properly training hazmat employee? (49 CFR 172.704 (c)(1))

Do the HazMat related records for each HazMat employee cover his time as a HazMat employee + 90 days? (49 CFR 172.704(d))?



Recordkeeping

Have you verified all of this information by auditing records?



Need help? Contact me..

Contact Information:

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