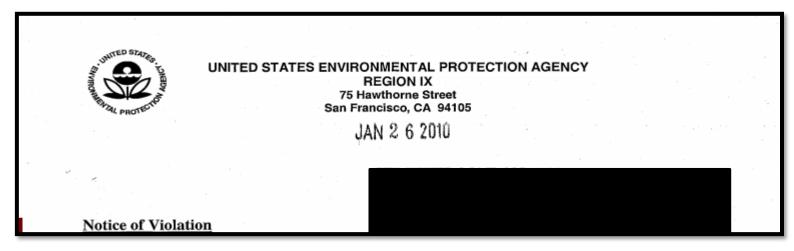


Standard for Hazardous Waste Management, Compliance Checklist

Sean K. Grady, CHMM | Vice President-Principal





- 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#.



	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?
(82	261 40(c))

Waste Characterization Form

- 1. Wastestream Name:_____
- 2. Process Generating:
- 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.





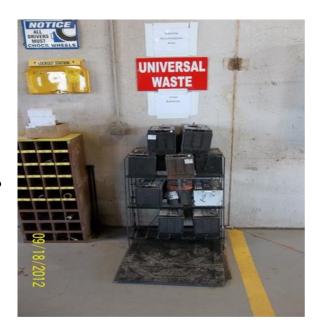




90 day Accumulation Area §262.34 and §265 Subpart I

- 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

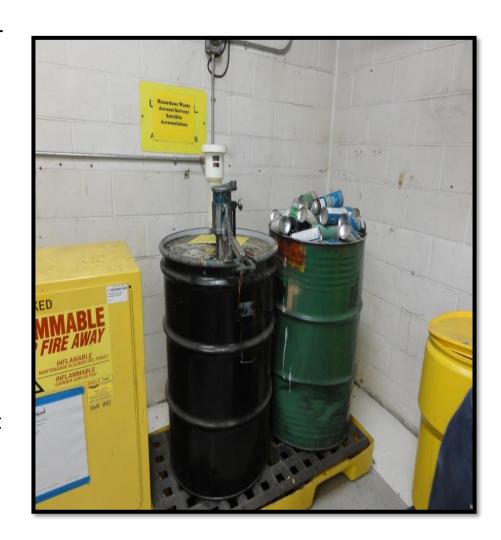
§262.34 and §265 Subpart I

		Checkli		
PROJECT INFORMATION				
PROJECT NAME:	PROJECT NO.:			
SITE LOCATION:				
NSPECTION DATE/Time:				
SENERATOR INFORMATION				
GENERATOR NAME:				
EPA ID NO.:	GENERATOR STATUS:	LQG S	SQG	CESQG
ADDRESS:	CITY/ST:	Z	IP:	
PHONE:	CONTACT NAME:			
STORAGE AREA INSPECTION		YES	NO	N/A
	·			14.7.4
IS STORAGE AREA SECURED FROM UNAUTH				
IS STORAGE AREA ACCESSIBLE IN THE EVEN				
IS THERE APPROPRIATE SPILL CONTAINMEN EQUIPMENT ACCESSIBLE?	IT / DECONTAMINATION			
IS EQUIPMENT PROPERLY MAINTAINED AND	IN WORKING CONDITION?			
IS THERE A COMPATIBLE FIRE EXTINGUISHE MAINTAINED AND IN WORKING CONDITION?	R ACCESSIBLE, PROPERLY			
IS THERE A SOURCE OF WATER NEARBY FO	R FIRE-FIGHTING EQUIPMENT?			
IS THERE AN INTERNAL ALARM / COMMUNIC.	ATION SYSTEM AVAILABLE?			
IS THERE AN EMERGENCY CONTACT TELEPI	HONE NUMBER POSTED?			
ARE CONTAINERS IN GOOD CONDITION, NOT	Γ DETERIORATED NOR LEAKING?			
ARE THE WASTES BEING STORED COMPATIE	3LE WITH CONTAINERS?			
ARE CONTAINERS CLOSED UNLESS WASTE ADDED TO THEM?	IS CURRENTLY BEING			
IF WASTES STORED IN THE CONTAINERS AR CONTAINERS PROPERLY MARKED WITH THE				
DO CONTAINERS HAVE AN ACCUMULATION S ON THE LABEL?	START DATE CLEARLY MARKED			
ARE THE CONTENTS AND / OR D.O.T. PROPE MARKED ON THE LABEL?	R SHIPPING NAMES CLEARLY			
IS GENERATOR'S INFORMATION (i.e. EPA ID I MARKED ON THE LABEL?	NO., PHONE NO.) CLEARLY			
ARE CONTAINERS D.O.T. / U.N. APPROVED C	ONTAINERS?			
ARE CONTAINERS D.O.T. / O.N. APPROVED C				
IF REQUIRED, ARE CONTAINERS PLACED ON SYSTEM (i.e. CONCRETE BUNKER, SPILL-COI		1T		



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))

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П	123 I	Memory	Lane , IN 4612	11												
Н	Gener	itor's Phone	(317)	123-4567												
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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 a 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 is has not received a signed copy? (§262.42(b))



Land Disposal Restrictions (LDRs)

(40 CFR 268)

		Land	Disposal	Restricti	on (LDR)	
		Not	ification	and Certi	ification	
Generator Na	me:		Generator EPA	ID#:		
Generator Ado	dress:		Generator City,	, State, Zip:		
Profile#:			Manifest#:			
Receiving Fac			Receiving Fac	cility EPA ID:		
Receiving Faci						
Receiving Fac	ility City, State, Zip:					
Manifest Number	Manifest Line Number	USEPA Hazardou	us Waste Codes	Subcategory	WW/NWW	Underlying Hazardous Constituents (§268.2(i))
Hamber	THEFT	+				CONSTRUCTION (SECONDIA)
				<u> </u>	-	
					-	
		 				
					 	

- Is the hazardous waste subject to LDRs?
 - If yes, do they meet LDR standards or do they have exclusions to the standards?
 - If yes, has the TSDF been notified?
 - If no, has the TSDF been notified?
 - If no, does the facility treat LDR hazardous wastes to meet the standards?
 - If yes, does the facility comply with §268.7(a)(5)?



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?





If the facility is LQG, biennial reports are required. §262.41(b)

Report should include description of the efforts taken to reduce volume and toxicity of the waste generated, and the changes achieved in the volume and toxicity. (§262.42(a)(6) & (7))

SQGs are not subject to the above regulations.

Many states have their own annual or quarterly requirements. So check to see if Annual reporting is required.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:	U.S. ENVIRONMENTAL PROTECTION AGENCY
SITE NAME:	
	2015 Hazardous Waste Report
EPA ID Number	GM FORM WASTE GENERATION AND MANAGEMENT
Sec. 1 A. Waste description:	
B. EPA hazardous waste code(s) C. State hazardous	ous waste code(s)
D. Source code E. Form code F. Quantity gener	rated in 2015 G. Waste
IGI I	minimization code
Management Method code for Source code G25 UOM	
Density	
Sec. 2 Was any of this waste that was generated at this facility treated, disposed, a Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) No (SKIP TO SEC. 3)	and/or recycled on site?
ON-SITE PROCESS SYSTEM 1	ON-SITE PROCESS SYSTEM 2
On-site Management Quantity treated, disposed, or Method code recycled on site in 2015 On-site Management Method code	
<u> </u>	
Sec. 3 A. Was any of this waste shipped off site in 2015 for treatment, disposal, or n	ecycling?
□ No (FORM IS COMPLETE)	•



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

40 CFR 265.52 (e) requires that em following Emergency Equipment Inv	nergency equipment at the Facility by ventory Table meets this requiremen	
Em	ergency Equipment Inventory Ta	ble
Fire	Extinguishing Systems/ Equipm	ent
Equipment Type	Location	Description
☐ Automatic Fire Sprinkler		-
Systems		
☐ Fire Alarm Boxes/Stations		
☐ Fire Extinguishers (describe)		
☐ Fire Hydrants		
☐ Foam Systems (describe)		
☐ Other (describe)		
-	•	
	Equipment and Decontamination	Equipment
Equipment Type	Location	Description
☐ Absorbents (describe)		
D.D. (D.) (1) 1		

Emergency Equipment

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.

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))





For LQGs:

Does the	e facility have a training program for effective response to emergencies that includes
(§265.16	6(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 Training49 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 re	ecords 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 to	raining materials include the following modules:
	General awareness/Familiarization
	Function specific training
	Safety
	Driver Training (49 CFR 172.704(a))



DOT Training continued49 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)

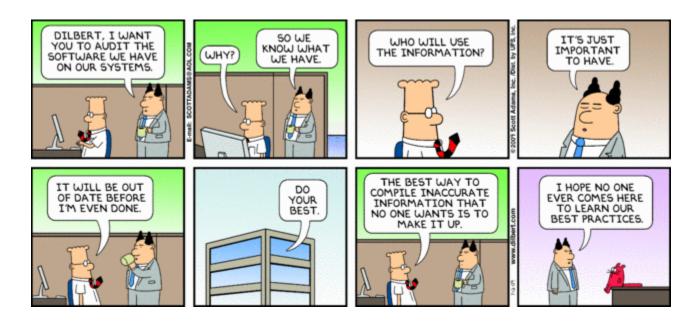
Do the HazMat related records for each HazMat employee cover his time as a HazMat employee + 90 days? (49 CFR 172.704(d))?





Recordkeeping

Have you verified all of this information by auditing records?





Need help? Contact me...

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