

LQG Hazardous Waste Generator Inspection Checklist

Company Name: _____

Mailing Address: _____

Physical Address: _____

Contact Person: _____

Phone Number: _____

EPA ID #: _____

Inspection Date: _____

INSPECTION PARTICIPANTS:

Maine DEP: _____

Company: _____

Other: (EPA etc) _____

DEP Licenses: Type License #

FACILITY INFORMATION:

Generator Type: SQG SQG+ LQG

Business Hours: _____ Septic Sewer

of Employees: _____ City Water Private Well

Products/Services: _____

Identified Hazardous Wastes

Hazardous Waste Code Chemical Hazard	Process Generating Waste Location in Facility	Amount Per Month	How Determined Hazardous (listed, tested, known)

851 (5)	Did facility fail to identify any of the above hazardous waste?	YES	NO
851 (6)(B), (7)	Did facility offer waste to an unauthorized transporter?	YES	NO
851(12)	ANY Treatment/Disposal of HW? *If YES is facility licensed?	YES* YES	NO NO

LQG Management Standards

of containers in Violation

851(8)(B)(3)	Is each container/tank labeled with the words “Hazardous Waste”?	YES	NO
851(8)(B)(3)	Is the accumulation start date (ASD) on each container?	YES	NO
40CFR265.173	Are all containers closed?	YES	NO
851(8)(C)	Is all waste shipped off site with 90 days of the ASD?	YES	NO*
	*If NO has extension been requested and granted?	YES	NO
851 (13)(A)	Are wastes managed to prevent/minimize risk to environment?	YES	NO
851 (13)(B)(1)	Are wastes accumulated and stored on an impervious surface? 4” concrete/asphalt no drains or other breaks.	YES	NO
851 (13)(B)(2)	Does each storage area have containment and collection system? 20% of capacity of all containers in area or 110% of largest container whichever is greater.	YES	NO
851(13)(C)(3)	Are any tanks or containers rusted, bulging, or leaking?	YES	NO
851(13)(C)(4)	Is waste compatible with container/tank?	YES	NO
851(13)(C)(6)	Are incompatible wastes segregated? Must prevent contact of incompatibles under any circumstance including simultaneous discharges.	YES	NO
851(13)(C)(7)	Are containers stored in a manner that allows inspection or action?	YES	NO
851(13)(C)(7)(a)	Containers stacked in rows in excess of 4 wide and 2 high? Only applies to containers with a capacity of 10 gals or more.	YES	NO
851(13)(C)(7)(b)	Is there at least 36” of aisle space between rows of HW containers?	YES	NO
	Rows against walls are more than 1 container wide and 2 high? Only applies to containers with a capacity of 10 gals or more.	YES	NO
851(13)(D)	Daily inspections conducted during regular business days? Should have 1 year of inspections.	YES	NO
	Log book contains:		
	Name of person conducting inspections?	YES	NO
	Date and time of inspections?	YES	NO
	Results of inspections?	YES	NO
40CFR264.32	Is facility equipped with:		
	Internal comms or alarm system that provide emergency instruction?	YES	NO
40CFR264.34	Telephone or two-way radio at HWSA?	YES	NO
	Fire extinguisher, Spill control equipment, and decon equipment?	YES	NO
40CFR264.33	Is above equipment tested to assure proper operation?	YES	NO

851(13)(B)(3-5)	Any HW stored in tanks?	YES*	NO
	If YES, Can tank be fully inspected?	YES	NO
	*If base is only part that is not visible: Is tank constructed iaw 40CFR265.193(e)(3)?	YES	NO
	Do uncovered tanks have at least 2 feet freeboard?	YES	NO
	Do tanks have automatic overflow protection?	YES	NO
(851)(13)(C)(2)	Have tanks and piping been tested annually?	YES	NO

851(13)(C)(7)(c) **Security for Hazardous Waste Storage Areas (HWSA)**

40 CFR 264.14(a)	Is unknowing entry prevented and unauthorized entry minimized? Includes persons and livestock.	YES	NO
40 CFR 264.14(b)	Does facility have 24 hr surveillance for HWSA?	YES	NO
	or Does facility have an artificial barrier that surrounds HWSA?	YES	NO
	and Is there a means to control entry, at all times to the HWSA?	YES	NO
40 CFR 264.14(c)	HWSA has “Dangerous-Unauthorized Personnel Keep-Out” sign?	YES	NO
40 CFR 264.17	“No Smoking” sign, if ignitable or reactive waste stored in HWSA?	YES	NO
40 CFR 265.176	Ignitable or reactive wastes stored at least 50 ft from property line?	YES	NO

Satellite Accumulation Areas (SAA)

851(8)(C)	Is the SAA: At or near the point of generation of the waste?	YES	NO
	Under the control of operator of the process generating the waste?	YES	NO
	Is Full date on container?	YES*	NO*
	*IF YES, is date less than three days ago?	YES	NO
	*IF NO, is container Full?	YES	NO
	Does the SAA contain less than 55 gallons of each type of waste? Limited to 1 quart of each acute hazardous waste.	YES	NO
851(8)(B)(3)	Is each container labeled with the words “Hazardous Waste”?	YES	NO
40CFR165.173	Are all containers closed?	YES	NO
851(13)(D)(1)	Daily inspections conducted and written log maintained?	YES	NO
851 (13)(B)(1)	Are wastes accumulated and stored on an impervious surface? 4” concrete/asphalt no drains or other breaks.	YES	NO

Name and each SAA and type of HW generated there:

1	4
2	5
3	6

Personnel Training Requirements

40CFR264.16	Have facility personnel successfully completed a training program?	YES	NO
	Does the training program meet the requirements of 40 CFR 264.16?	YES	NO
	Trains personnel to perform their duties in a way that ensures compliance?	_____	_____
	Training is directed by a person trained in HW management?	_____	_____
	Includes contingency plan implementation?	_____	_____
	Ensures personnel are able to respond to emergencies?	_____	_____
	Familiarizes personnel with emergency equipment and systems? (Including: comms, alarms, shutdown)	_____	_____
	Initial training conducted within 6 mths of hire or transfer to new position?	_____	_____
	Annual refresher training for all employees?	_____	_____
40CFR264.16((d)	Are the following documents maintained at the facility?	YES	NO
	Job title and employee name for each position associated with HW?	_____	_____
	Written job descriptions for each position?	_____	_____
	Written description of both introductory and continuing training?	_____	_____
	Record of training given to and completed by personnel?	_____	_____
	Training records for former employees kept 3 years?	_____	_____

Contingency Plan Requirements

40CFR264.51	Does facility have a contingency plan?	YES	NO
40CFR264.52	Does the contingency plan:	YES ↓	NO ↓
	Minimize hazards to human health or environment? Caused by fires, explosions, or any unplanned release of HW.	_____	_____
	Describe the actions to be taken during above emergencies?	_____	_____
	Describe arrangements made with State and Local Agencies?	_____	_____
	List names, addresses and phone #(home and work) of emergency coordinators?	_____	_____
	Is list of emergency coordinators up to date?	_____	_____
	Include a list of all emergency equipment Including location, description & capability? Including Fire extinguishing, spill control, and decon, equipment and comms/alarm systems.	_____	_____
	Includes an evacuation plan?	_____	_____
40CFR264.53	Has the plan been submitted to all State and local agencies? Annually or when changes are made to the plan.	_____	_____
40CFR264.54	Have revisions/changes of plan been resubmitted to local agencies?	_____	_____
40CFR264.55	Is there an emergency coordinator available 24 hrs a day?	_____	_____
	Does EC have authority to commit resources needed?	_____	_____
40CFR264.37 & 851(13)(C)(7)(c)(ii)	Has Company attempted to annually make mutual aid agreements?	YES	NO

Small Quantity Generator Checklist

Less than 27 gallons generated per month and less than 55 gallons in storage.

850(3)(A)(5)(d)	Is waste stored in a container no greater than 55 gallons in size?	YES	NO
	Is container labeled with the full date when full?	YES	NO
851(8)(A)	Do containers meet the pre-transport requirements of this cite?	YES	NO
851(8)(B)(3)	Is the accumulation start date on the container?	YES	NO
	Is the container labeled with the words "Hazardous Waste"	YES	NO
850(3)(A)(5)(d)	Is waste properly manifested iaw Chapter 857?	YES	NO
	Does generator use a licensed HW transporter?	YES	NO
	Is waste transported to an authorized facility?	YES	NO
	Is waste shipped off site within 180 days of the full date?	YES	NO

Small Quantity Generator Plus Requirements (plus above)

Less than 27 gallons generated per month and less than 3-55 gallon drums in storage.

850(3)(A)(5)(d)	Does facility have an EPA ID#?	YES	NO
	Is waste stored on a firm working surface?	YES	NO
	Does storage area have secondary containment?	YES	NO
	Are containers in good condition?	YES	NO
	Is waste compatible with container?	YES	NO
	Are daily inspections conducted & log book complete?	YES	NO
	Are containers closed?	YES	NO

Records/Manifest Review

857(5)(A)	Does the facility use a HW manifest for all shipments of HW?	YES	NO
851(7)(A)	Is a licensed HW transporter used for all shipments of HW?	YES	NO
851(7)(B)	Is HW shipped to a licensed disposal facility?	YES	NO
857(7)(A)(1-2)	Are manifests completed and signed?	YES	NO
857(7)(A)(6)	Are signed TSDF and generator copies and LDRs retained by facility? (Copy 3 ME manifest) (Copy 8 ME manifest)	YES	NO
857(7)(A)(6)	Are above copies kept for at least three years (five years for LDRs)?	YES	NO
857(7)(E)	Are signed TSDF copies returned to generator within 35 days? (From date of shipment)	YES	NO*
	*If NO does facility notify TSDF, transporter, and DEP?	YES	NO
857(7)(G)	If signed TSDF copy not received within 45 days is report submitted? (Written exception report should be submitted to ME DEP)	YES	NO
857(7)(H)	If waste is rejected is rejection report filed? (Must be filed within 20 days of rejection)	YES	NO
851(9)(E)	Does facility submit Annual reports?	YES	NO

Does facility keep:

851(9)(A)	All test results for at least 10 years?	YES	NO
851(9)(B)	All reports filed with DEP or EPA least 10 years? Includes annual reports etc...	YES	NO
851(9)(C)	All logs for at least one year? Includes HWSA and SAA inspection logs.	YES	NO

857(6)(D)	Does facility Export HW? *IF YES, See 40CFR262 Subparts E and F, and 40CFR263	YES*	NO
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License Requirements

851(12)(A)&856	Are any HW treated or disposed of?	YES*	NO
	* If YES, is facility licensed to treat each waste treated?	YES	NO
	If licensed:		
	Is license current and accurate? (For the current unit or process)	YES	NO
38MRSA 2301-2313	Does facility have a Pollution Prevention (P2) Plan? (LQG only)	YES	NO