

**Hazardous Waste Management
Generators, Storer and Treater Question and Answer Checklist**

- | | <u>Yes</u> | <u>No</u> \ |
|---|------------|-------------|
| • Does the plant generate less than 100 Kilograms/month of hazardous waste? | — | — |
| • Does the plant have an EPA Identification Number? | — | — |
| • If yes, Indicate State and Registration Number:
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| • Does the plant generate solid wastes that exhibit hazardous characteristics? | — | — |
| • If yes how was this determination made?
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| • Are there any other solid wastes generated? | — | — |
| • If yes, were all wastes tested to determine which wastes are non hazardous? | — | — |
| • Are the people in your plant who are responsible for Shipping hazardous wastes familiar with DOT regulations? | — | — |
| • Is each container marked in accordance with DOT requirements? | — | — |
| • Does the plant store wastes for more than 90 days? | — | — |
| • Is there a program to prevent storage for more than 90 days? | — | — |
| • Are containers used to store waste temporarily before transport? | — | — |
| • Is each container marked with an approved hazardous waste label? | — | — |
| • Is each container clearly dated? | — | — |
| • Are containers inspected for leakage and/or corrossions at least weekly? | — | — |

	<u>Yes</u>	<u>No</u>
• Does the plant ensure that containers holding ignitable or reactive waste are at least 50 feet from the facility's property line?	___	___
• Does the storage area provide secondary containment?	___	___
• Does the facility receive waste from off-site?	___	___
• Is there sufficient aisle space to allow unobstructed movement of personnel and equipment?	___	___
• Does the plant maintain personnel training records at the facility?	___	___
• If yes, do the records include:		
a. A job title and written job description of each position?	___	___
b. A description of type and amount of training	___	___
c. The records of training given to operations' personnel?	___	___
• Does your plant have a contingency plan?	___	___
• Is the plan maintained at the facility?	___	___
• Does the plan include a current SPCC plan?	___	___
• Is there an emergency coordinator on site or on call at all times?	___	___
• Have arrangements been made with local authorities to familiarize them with characteristics of the plant?	___	___
Has the facility arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility?	___	___
• Does the facility handle ignitable or reactive wastes?	___	___
• Are ignitable wastes handled and stored in a manner so as to prevent fires and/or explosions?	___	___
• Is there evidence of heat generation from incompatible wastes?	___	___

- | | <u>Yes</u> | <u>No</u> |
|--|------------|-----------|
| • Is the facility equipped with adequate communication and safety equipment? | ___ | ___ |
| • Does the plant store any hazardous materials in underground storage tanks? | ___ | ___ |

If yes, describe what method(s) the plant uses to ensure tank integrity

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| • Has the plant notified the appropriate state agency of its underground storage tanks? | ___ | ___ |
| • Has the plant initiated a program to minimize the amount and toxicity of waste generated? | ___ | ___ |
| • Does the owner/operator keep a written operating record at the facility? | ___ | ___ |

If yes, do records include:

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| a. A description and quantity of each hazardous waste received? | ___ | ___ |
| b. The location and quantity of each hazardous waste at each location? | ___ | ___ |
| c. The records and results of waste analyses | ___ | ___ |
| d. The records of incidents involving implementation of a contingency plan? | ___ | ___ |
| e. The records and results of required inspections? | ___ | ___ |
| f. Any monitoring, testing or analytical data? | ___ | ___ |
| g. A closure plan and cost estimate? | ___ | ___ |
| • Does the owner/operator maintain a written inspection schedule at the facility? | ___ | ___ |

If yes, does the inspection schedule include:

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|---|-----|-----|
| a. The monitoring equipment? | ___ | ___ |
| b. The safety and emergency equipment location? | ___ | ___ |
| c. The security devices? | ___ | ___ |
| d. The operating and structural plan? | ___ | ___ |

	<u>Yes</u>	<u>No</u>
e. Types of problems with equipment, such as malfunctions and operator error?	___	___
• Does the owner/operator maintain an inspection log?	___	___
If yes, does the log include:		
a. The date and time of inspection?	___	___
b. The name of the inspector?	___	___
c. A notation of observations?	___	___
d. The date and nature of repairs or remedial actions?	___	___
• Has a RCRA Part B Application been filed?	___	___
If yes, does the plan include:		
a. The parameters for which waste will be analysed?	___	___
b. The test methods used to test for these parameters?	___	___
c. The sampling method used to obtain the sample?	___	___
d. The frequency with which the initial analyses will reviewed or repeated?	___	___
• Does the facility provide adequate security?	___	___
• Does the plant use the Uniform Hazardous Waste Manifest for each off site shipment?	___	___
• Does the plant have a system to maintain the following reports for 3 years?		
a. Manifests and signed copies from designated facilities?	___	___
b. Biennial reports?	___	___
c. Exception reports?	___	___
d. Test results?	___	___
Where are the records kept? _____		
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Has the plant ever been inspected by a state agency or EPA for RCRA compliance?	___	___
a. What was the date of the most recent inspection?		
b. Was a Notice of Violation received as a result of the inspection?	___	___

- Describe your on-site waste minimization efforts.

- Have all off-site hazardous waste disposal facilities been inspected and approved by representatives of your company?

<u>Yes</u>	<u>No</u>
___	___