# SMALL QUANTITY GENERATOR CHECKLIST (SQG)

**November 2018 Draft**

Facility Name:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Facility Representative:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Facility ID #:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Email Address:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Inspector: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Describe the facility's hazardous waste streams:

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| --- | --- | --- | --- | --- | --- |
| *WASTE**DESCRIPTION* | *EPA* *Waste Codes* | *Generation Rate* | *Disposal Facility**and EPA ID* | CorrectID? | *Testing or Process Knowledge* |
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(describe discrepancies in waste identification in narrative)

2. Has the facility correctly determined whether the solid wastes being generated are hazardous waste at the point of generation before dilution, mixing, alteration or treatment? (262.11(a)) Ind. Req. Y\_\_\_ N\_\_\_

3. Did the facility determine if wastes were excluded? (262.11(b)) Ind. Req. Y\_\_\_ N\_\_\_ N/A \_\_\_

4. Did the facility determine if the wastes were listed? (262.11(c)) Ind. Req. Y\_\_\_ N\_\_\_ N/A \_\_\_

5. Did the facility determine if the wastes exhibited any characteristics? (262.11(d)) Ind. Req. Y\_\_\_ N\_\_\_ N/A \_\_\_

 \_\_\_ Process knowledge? \_\_\_ Product knowledge? \_\_\_ Testing?

6. Are records documenting the waste determinations on file for at least three years since the waste was last sent for treatment, storage or disposal? (262.11(f)) Ind. Req. Y\_\_\_ N\_\_\_ new

 \_\_\_ waste profiles? \_\_\_ waste analyses? \_\_\_ other?

7. Has the facility determined all applicable EPA waste codes for the wastes? (262.11(g)) Ind. Req. Y\_\_\_ N\_\_\_ new

8. Has the generator correctly determined its generator category? (262.13) Ind. Req. Y\_\_\_ N\_\_\_ new

9. Does the facility generate the following amounts of hazardous waste in a calendar month: (262.16(a))

 Greater than 100 kgs (220 lbs) but less than 1,000 kgs (2200 lbs) of non-acute

 hazardous waste? Y \_\_\_\_ N \_\_\_\_

 AND Less than or equal to 1kg (2.2 lbs) of acute hazardous waste listed in 261.31

(hazard code H) or 261.33(e)? Y \_\_\_\_ N \_\_\_\_

 AND Less than or equal to 100 kgs (220 lbs) of residue, soil, water or other debris resulting from a cleanup of acute hazardous waste listed in 261.31 (hazard code H) or 261.33(e)? Y \_\_\_\_ N \_\_\_\_

10. If not, has the facility notified of an episodic event? Y \_\_\_\_ N\_\_\_\_ new

 \_\_\_\_\_\_planned? \_\_\_\_ unplanned?

**If yes, please complete the Episodic Event Section of this Checklist**

**If no, then then complete the LQG checklist.**

11. Has the facility obtained an EPA ID number? (262.18(a)) Ind. Req. Y\_\_\_ N\_\_\_

12. Beginning September 1, 2021, did the SQG re-notify EPA every four years by September 1? (262.18(d)(1)) Ind. Req. Y\_\_\_ N\_\_\_ new

13. Are exempt hazardous secondary materials legitimately reclaimed under the
control of the generator per 261.4(a)(23)? Y\_\_\_ N\_\_\_ N/A \_\_\_

 If the conditions below are not met, the material must be counted towards the monthly rate of generation

 \_\_\_ (i)(A) at the same facility or

 \_\_\_ (i)(B) at an off-site facility under the same control with a written certification or

 \_\_\_ (i)(C) under a written contract with a toll manufacturer, and reclaimed by the manufacturer where the
 manufacturer provides a signed certification

 \_\_\_ (ii)(A) Material is contained – no leaks or other continuing or intermittent releases

 \_\_\_ (ii)(B) Material is not accumulated speculatively

 \_\_\_ (ii)(C) Notice is provided on DEP Form 8700-12FL or equivalent

 \_\_\_ (ii)(D) No other material specific management conditions apply (such as with universal waste)

 \_\_\_ (ii)(E) Documentation is maintained of legitimacy determinations

 \_\_\_ (ii)(F) Generator complies with 40 CFR 261 Subpart M Emergency Preparedness and Response requirements

 (similar to LQG training, emergency equipment and contingency planning)

14. Are exempt hazardous secondary materials legitimately reclaimed after transfer
to a third party reclaimer per 261.4(a)(24)? Y\_\_\_ N\_\_\_ N/A \_\_\_

 If the conditions below are not met, the material must be counted towards the monthly rate of generation

 \_\_\_ (i) Material is not accumulated speculatively

 \_\_\_ (ii) Material is only managed by the generator, transporter, intermediate facility and reclaimer

 \_\_\_ Material is not stored more than 10 days in one transfer facility location and is

 \_\_\_ Packaged in accordance with USDOT regulations

 \_\_\_ (iii) No other material specific management conditions apply (such as with universal waste)

 \_\_\_ (iv) Recycling is legitimate per 260.43

 \_\_\_ (v)(A) Material is contained – no leaks or other continuing or intermittent releases

 \_\_\_ (v)(B) Verified recycling facility has a \_\_\_ RCRA permit \_\_\_ Variance/Exemption from permitting

 \_\_\_ (v)(C) Generator maintains 3 years of records of all shipments with name of transporter, date of shipment
 name and address of each reclaimer and intermediate facility if applicable, material type and quantity

 \_\_\_ (v)(D) Generator maintains for 3 years confirmation of receipt of each shipment (bills of lading, etc.)

 \_\_\_ (v)(E) Generator complies with 40 CFR 261 Subpart M Emergency Preparedness and Response requirements

 (similar to LQG training, emergency equipment and contingency planning

 \_\_\_ (vii) All persons claiming the exclusion must have notified per 40 CFR 260.42

15. Are any hazardous wastes treated or disposed of on-site? Y\_\_\_ N\_\_\_

 If yes, is the process exempt from permit requirements? (403.727(1)(b), FS) Y\_\_\_ N\_\_\_\_
 Describe in narrative. – No thermal treatment, incineration, or land based treatment or storage units allowed

 If yes, does the facility have a written waste analysis plan? (268.7(a)(5)) Y\_\_\_ N\_\_\_

 If yes, written notification/certification records for the treated waste?(268.7) Y\_\_\_ N\_\_\_

16. If the facility includes an academic laboratory, has it notified (using EPA Form 8700-12) that it is operating under 40 CFR 262 Subpart K? Y\_\_\_ N\_\_\_ N/A \_\_\_

 If so, is it in compliance with the additional requirements that apply? Y\_\_\_ N\_\_\_

17. Are the following conditionally excluded wastes managed in compliance? (Y/N - describe violations in narrative)

**Please complete and attach appropriate checklists for \_\_\_ Used Oil \_\_\_ Used Oil Filters \_\_\_\_ UW \_\_\_ UPW**

## Independent Requirements - 40 CFR 262 Subpart B and D – Manifests and Records

1. Does the facility use a manifest for all of its hazardous wastes? (262.20) Y\_\_\_\_ N\_\_\_\_

 If no, is it using a tolling agreement? Y\_\_\_\_ N\_\_\_\_

 If tolling agreements are used, does the generator ship waste under a contractual agreement exemption using only vehicles owned and operated by the reclaimer (tolling agreement)? (262.20(e)) Y\_\_\_\_ N\_\_\_\_

\_\_\_ Are records specifying the type and quantity of waste and frequency of shipment kept on file for three years?

2. If the facility uses a manifest, is it using the current correct form (EPA 8700-22; OMB #2050-0039)? Y\_\_\_\_ N\_\_\_\_

 If yes, was the manifest issued by an EPA-approved registrant? (see epa.gov) Y\_\_\_\_ N\_\_\_\_

3. Does the facility ship by rail or water? (If so, see 262.23(c) and (d) for requirements) Y\_\_\_\_ N\_\_\_\_

4. Are the manifest fields below filled out properly? (262.20(a)(1)) Y\_\_\_\_ N\_\_\_\_

\_\_\_ 1 Generator EPA ID number

\_\_\_ 3 An emergency phone number

\_\_\_ 5 Generator name and mailing address

 -Generator's site address (if different from mailing address)

 -Generator phone number

\_\_\_ 6-7 Transporter names and ID numbers (verify that Transporter is registered in Florida)

\_\_\_ 8 TSD name and site address

 -TSD # EPA ID #

 -TSD Phone number

\_\_\_ 9a Checked if quantity is a DOT Hazmat in a single package

\_\_\_ 9b DOT shipping name, including hazard class, ID #

 and packaging group

\_\_\_ 10 Container number and type

\_\_\_ 11-12 Quantity of waste and units of weight or volume

\_\_\_ 13 EPA waste codes

\_\_\_ 14 Handling Instructions (usually waste profile numbers)

\_\_\_ 15 Signed waste minimization language for SQGs (see 262.27(b))

\_\_\_ 15 Name, handwritten signature of generator and date

\_\_\_ 16 International shipment information

\_\_\_ 17 Name, handwritten signature of transporter and date

\_\_\_ 18 Are any manifest discrepancies noted? (describe in narrative.)

 -Was an alternate facility used or was waste returned?

 (returned waste requires the generator to sign at 18c)

\_\_\_ 19 On signed copies only, did the TSDF note handling codes?
 (If a Florida TSDF, refer to applicable district office)

\_\_\_ 20 Name, handwritten signature of TSD and date

 (SQG must sign if a new manifest was used for returned waste – 262.16(e)(2)

5. Note manifest document numbers and dates of manifests with errors below:

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| --- | --- | --- | --- |
| Manifest # | Date | TSD | Error(s) |
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6. Record the Hazardous Waste Transporter and TSD info here:

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| --- | --- | --- | --- |
| Manifest # | Date | TRA and ID number | TSD and ID Number |
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7. Identify common waste streams generated by the facility by entering information about the wastes from the last 8 manifests here:

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| --- | --- | --- | --- | --- |
| Date | # of Drums | Weight | Waste Codes | Waste Stream |
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8. Number of manifests reviewed? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

9. Are copies of manifests kept for three years? (262.40(a)) Y\_\_\_ N\_\_\_

10. If the generator did not receive a signed return copy of the manifest from the disposal facility within 60 days of shipment, did the facility notify DEP and send a legible copy of the manifest?

 (262.42(b)) Y\_\_\_ N\_\_\_

11. Is the facility disposing of all its wastes to facilities that have ID #s and are permitted to accept the waste? (403.727(1)(a), FS; 403.727(3)(b)1, FS; or 40 CFR 262.18(c)) Ind. Req. Y\_\_\_ N\_\_\_

12. Are the transporters registered with FDEP? (transporter citation 62-730.170(2), FAC) Y\_\_\_\_ N\_\_\_

## Independent Requirements –40 CFR 268 - Land Disposal Restriction Requirements

1. Does the facility comply with applicable land disposal restriction requirements? (262.16(b)(7)) Y\_\_\_\_ N\_\_\_\_

\_\_\_ Waste is not diluted in lieu of treatment? (268.3)(a))

\_\_\_ Notification of land disposal restrictions including: (268.7(a) Generator Paperwork Table)

\_\_\_ EPA Waste Numbers?

\_\_\_ Treatability Group?

\_\_\_ Subcategory?

\_\_\_ Constituents of concern for F001-F005 and F039 wastes?

\_\_\_ Underlying hazardous constituents for characteristic wastes, except D001 High TOC subcategory?

\_\_\_ Signed certifications for wastes meeting treatment standards when shipped? (268.7(a))

\_\_\_ If treating waste on site, a written waste analysis plan? (268.7(a)(5))

\_\_\_ Copies of all notices, certifications, waste analysis data or other documents for 3 years from the date the waste was last shipped? (268.7(a)(8))

\_\_\_ For treated characteristic wastes, a notice identifying the name and address of the Subtitle D facility receiving the waste, describing the waste as generated and certifying that the waste meets treatment standards, or has been decharacterized but requires further treatment prior to land disposal? (268.9(d))

## Conditions for Exemption - 40 CFR 262.15 - Satellite Accumulation \_\_\_N/A

1. Do satellite accumulation points hold 55 gallons of waste or either one quart of liquid or 2.2 lbs. of solid acutely hazardous waste or less? (262.15(a)) Y\_\_\_\_ N\_\_\_\_

 If no, is the excess marked with the date the excess waste began accumulating? (262.15(a)(6)(iii)) Y\_\_\_\_ N\_\_\_\_

 Is the date within the past three calendar days? Y\_\_\_\_ N\_\_\_\_

 If not, inspect the area as a central accumulation area and complete applicable sections below (262.15(a)(6)(ii))

2. Are the satellite accumulation areas at or near the point of generation? (262.15(a)) Y\_\_\_\_ N\_\_\_\_

 Are they under the control of the operator of the process generating the waste? (265.15(a)) Y\_\_\_\_ N\_\_\_\_

3. Are the containers in good condition, or if the contents leak are they immediately transferred to a container that is not leaking? (262.15(a)(1)) Y\_\_\_\_ N\_\_\_\_

4. Are the containers made of or lined with materials compatible with the contents? (262.15(a)(2)) Y\_\_\_\_ N\_\_\_\_

5. Does the facility comply with 265.17(b) if placing waste or materials into the same container that are incompatible? (262.15(a)(3)(i)) Y\_\_\_\_ N\_\_\_\_ new

6. Does the facility comply with 265.17(b) if placing a waste into an unwashed container that held an incompatible waste or material? (262.15(a)(3)(ii)) Y\_\_\_\_ N\_\_\_\_ new

7. Does the facility separate containers of incompatible waste or materials or protect them by other means? (262.15(a)(3)(iii)) Y\_\_\_\_ N\_\_\_\_ new

8. Does the facility keep satellite containers closed except when adding or removing waste? (262.15(a)(4)(i)) Y\_\_\_\_ N\_\_\_\_

 If not, is venting the container necessary for proper operation of equipment or to prevent a dangerous situation? (262.15(a)(4)(ii)) Y\_\_\_\_ N\_\_\_\_ new

9. Are the containers marked with the words “Hazardous Waste?” (262.15(a)(5)(i)) Y\_\_\_\_ N\_\_\_\_ new

 And an indication of the hazards of the contents? (262.15(a)(5)(ii)) Y\_\_\_\_ N\_\_\_\_ new

 What system is used?

 Ig. Corr., React., Toxic labels? \_\_\_\_\_\_\_\_\_ DOT labels? \_\_\_\_\_\_\_ OSHA pictogram? \_\_\_\_\_\_\_\_

 NFPA labels? \_\_\_\_\_\_\_\_\_\_ Other system? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

10. Do the satellite areas meet the Preparedness, Prevention and Emergency Procedures regulations applicable to SQGs found in 262.16(b)(8) and 262.16(b)(9)? (262.15(a)(7)) Y\_\_\_\_ N\_\_\_\_ new

 **Please complete both of those Sections of this checklist and only mark “yes” above if all requirements have been met.**

## Conditions for Exemption - 40 CFR 262.16 – Accumulation Units

1. Does the facility accumulate the waste on-site prior to treatment or disposal? Y\_\_\_\_ N\_\_\_\_

 Check applicable accumulation units (Requirements for Units other than containers are found on separate checklists)

 \_\_\_ *Containers \_\_\_ Tanks \_\_\_ Containment Building \_\_\_ Drip Pad (wood preserver only)*

 If any containers on-site are prepared for shipment, also answer questions related to Part 262 Subpart C below.

2. Does the facility comply with the 180-day accumulation time limit? (262.16(b)) Y\_\_\_\_ N\_\_\_\_

3. If not, has the facility been issued an extension by the Department? (262.16(d)) Y\_\_\_\_ N\_\_\_\_

4. Does the facility comply with the 6000 kg maximum accumulation of hazardous waste? (262.16(b)(1)) Y\_\_\_\_ N\_\_\_\_

5. Does the facility comply with the requirement to not speculatively accumulate hazardous secondary materials, byproducts and sludges being reclaimed? (citation?) Y\_\_\_\_ N\_\_\_\_

## Conditions for Exemption - 262.16(b)(2) - Central Accumulation Containers

1. Are the containers in good condition, or if the contents leak are they immediately transferred to a container that is not leaking? (262.16(b)(2)(i)) Y\_\_\_\_ N\_\_\_\_

2. Are the containers made of or lined with materials that will not react with the contents? (262.16(b)(2)(ii)) Y\_\_\_\_ N\_\_\_\_

3. Are the containers closed? (262.16(b)(2)(iii)(A)) Y\_\_\_\_ N\_\_\_\_

4. Are containers holding hazardous waste open, handled or accumulated in a manner as to not cause the container to rupture or leak? (262.16(b)(2)(iii)(B)) Y\_\_\_\_ N\_\_\_\_

5. Are the containers being inspected at least weekly for leaking or deteriorating containers? (262.16(b)(2)(iv)) Y\_\_\_\_ N\_\_\_\_

Are records kept including: (62-730.160(3), FAC)
\_\_\_ Date of inspection?
\_\_\_ Time of inspection?
\_\_\_ Legibly printed name of the inspector?
\_\_\_ Number of containers?
\_\_\_ Condition of containers?
\_\_\_ Notes of observations made?
\_\_\_ Date and nature of any repairs or corrective actions?

6. Is sufficient aisle space provided for inspection of condition and labels of individual containers? (62-730.160(4), FAC) Y\_\_\_\_ N\_\_\_\_

7. Are incompatible wastes or incompatible wastes and materials not stored in the same containers unless 265.17(b) is complied with? (262.16(b)(2)(v)(A)) Y\_\_\_\_ N\_\_\_\_

8. Is hazardous waste placed into an unwashed container that previously held an incompatible waste or material unless 265.17(b) is complied with? (262.16(b)(2)(v)(B)) Y\_\_\_\_ N\_\_\_\_

9. Are containers of hazardous wastes that are incompatible with any waste or other materials that are accumulated nearby in other containers kept separated or protected by means of a dike, berm or other device? (262.16(b)(2)(v)(C)) Y\_\_\_\_ N\_\_\_\_

10. Is each container marked "Hazardous Waste"? (262.16(b)(6)(i)(A)) Y\_\_\_\_ N\_\_\_\_

11. Is each container marked with an indication of the hazards of the contents? (262.16(b)(6)(i)(B)) Y\_\_\_\_ N\_\_\_\_ new

 What system is used?

 Ig. Corr., React., Toxic labels? \_\_\_\_\_\_\_\_\_ DOT labels? \_\_\_\_\_\_\_ OSHA pictogram? \_\_\_\_\_\_\_\_

 NFPA labels? \_\_\_\_\_\_\_\_\_\_ Other system? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

12. Is each container clearly marked with an accumulation start date? (262.16.(b)(6)(i)(C)) Y\_\_\_\_ N\_\_\_\_

## Independent Requirements - 262 Subpart C – Pre-Transport Requirements

**\_\_\_\_N/A if no containers are prepared for shipment**

1. Are any containers on-site prepared for shipment? Y\_\_\_ N\_\_\_

 If so, are the containers appropriate for the waste? (262.30) Y\_\_\_ N\_\_\_

2. Are the correct diamond-shaped DOT hazard class container labels used? (262.31) Y\_\_\_ N\_\_\_

3. Are containers of 119 g or less marked with the correct DOT shipping name and UN or NA number? (262.32(a)) Y\_\_\_ N\_\_\_\_

4. Is each container of 119 gallons or less properly labeled as follows:

 \_\_\_ Is a label with the language required under 262.32(b)(1) used (HW language)?

 \_\_\_ Is the generator's name, address and EPA ID number on the label? (262.32(b)(2) and (3))

 \_\_\_ Is the correct manifest document number on the label? (262.32(b)(4))

 \_\_\_ Are the EPA waste numbers listed, or are bar codes cross referencing profiles provided? (262.32(c)) (262.11(g)) (except for lab packs requiring D004-D011 only) new

5. Are placards available to be provided to the transporter? (262.33) Y\_\_\_ N\_\_\_

6. Are bulk packagings used (over 400 kg solid or 119 g liquid), and if so are they marked and placarded properly?

 (citation?) Y\_\_\_ N\_\_\_

## Conditions for Exemption – 262.16(b)(8) - Preparedness and Prevention

**Complete this Section for <90 Day Containers and Satellite Containers**

**(Note: These requirements are new for Satellite Containers)**

1. Is the facility maintained to minimize the possibility of a fire, explosion, unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil or surface water which could threaten human health or the environment? (262.16(b)(8)(i)) Y\_\_\_\_ N\_\_\_\_

2. Does the facility have the following required equipment in areas where hazardous waste is generated or accumulated?

 \_\_\_ An internal communications or alarm system? (262.16(b)(8)(ii)(A))

 \_\_\_ A telephone or a hand-held radio alarm, 2-way radio or other device immediately available and capable of summoning assistance? (262.16(b)(8)(ii)(B))

 \_\_\_ Portable fire extinguishers? (262.16(b)(8)(ii)(C))

 \_\_\_ Fire control equipment? (262.16(b)(8)(ii)(C))

 \_\_\_ Spill control equipment? (262.16(b)(8)(ii)(C))

 \_\_\_ Decontamination equipment? (262.16(b)(8)(ii)(C))

 \_\_\_ Water at adequate volume and pressure? (262.16(b)(8)(ii)(D))

3. Is the emergency equipment tested and maintained as necessary to assure its proper operation in time of emergency? (262.16(b)(8)(iii)) Y\_\_\_\_ N\_\_\_\_

4. Is the emergency communication equipment accessible directly or through visual or voice contact in areas of the facility where waste is handled? (262.16(b)(8)(iv)(A)) Y\_\_\_\_ N\_\_\_\_

5. If there is just one employee on the premises, does he have immediate access to a device such as a telephone or a two-way radio capable of summoning external emergency assistance unless such a device is not required under (a)(8)(ii)? (262.16(b)(8)(iv)(A)) Y\_\_\_\_ N\_\_\_\_

6. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (262.16(b)(8)(v)) Y\_\_\_\_ N\_\_\_\_

7. Has the facility made emergency response arrangements with the following: (262.16(b)(8)(vi)(A))

\_\_\_\_ Local Police Department?

\_\_\_\_ Fire Department?

\_\_\_\_ Emergency Response Teams?

\_\_\_\_ Emergency Response Contractors?

\_\_\_\_ Equipment Suppliers?

\_\_\_\_ Local hospitals?

\_\_\_\_ LEPC?

8. Has the facility determined the need for the services? (262.16(b)(8)(vi)(A)(1)) Y\_\_\_\_ N\_\_\_\_

9. Did the arrangements familiarize the organizations with: (262.16(b)(8)(vi)(A)(2)):

 \_\_\_\_ The layout of the facility?

 \_\_\_\_ The properties of hazardous waste handled and associated hazards?

 \_\_\_\_ Places where personnel normally work?

 \_\_\_\_ Entrances to roads inside the facility and possible evacuation routes?

 \_\_\_\_ Types or injuries or illnesses that could result from fires, explosions or releases?

10. Where more than one police or fire department might respond, did the facility make arrangements designating a primary authority? (262.16(b)(8)(vi)(A)(2)): Y\_\_\_\_ N\_\_\_\_ N/A \_\_\_\_

11. Are the arrangements, or attempt to make arrangements documented?

 (262.16(b)(8)(vi)(B)) Y\_\_\_\_ N\_\_\_\_

12. Alternatively, does the facility have 24-hour response capability, has a waiver, and the waiver is documented in the operating record? (262.16(b)(8)(vi)(C)) Y\_\_\_\_ N\_\_\_\_

## Conditions for Exemption – 262.16(b)(9) – Emergency Procedures

1. Is there an emergency coordinator on site or within short driving distance of the plant at all times? (262.16(b)(9)(i)) Y\_\_\_\_ N\_\_\_\_

 Who is the emergency coordinator?\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

2. Is the following information posted next to a telephone or in areas directly involved in the generation and accumulation of hazardous waste: (262.16(b)(9)(ii))

\_\_\_\_ Name and emergency telephone number of emergency coordinator?

\_\_\_\_ Location of fire extinguishers, spill control material and, if present,
fire alarm?

\_\_\_\_ Telephone number of the fire department, if no direct alarm?

3. Are all employees thoroughly familiar with proper waste handling and emergency procedures as relevant to their responsibilities during normal facility operations and emergencies? (262.16(b)(9)(iii)) Y\_\_\_\_ N\_\_\_\_

4. Does/did the emergency coordinator know how to respond appropriately to an event of a fire, a spill which can be contained, or a fire, explosion or other release which could threaten human health outside the facility or reach surface water? (262.16(b)(9)(iv)) Y\_\_\_\_ N\_\_\_\_

5. In the event of an emergency, does/did the emergency coordinator: (262.16(b)(9)(iv)(A-C))

\_\_\_\_ Fire – call the fire department or extinguish it with a fire extinguisher?

\_\_\_\_ Spill – contain the spill and clean up the waste or hire a contractor to do so?

\_\_\_\_ Reporting – as applicable, notify the NRC, SWO or County authorities?

**40 CFR 262 Subpart H – Transboundary Movements N/A\_\_\_\_**

1. Has the facility exported any hazardous waste? (262.83) Y\_\_\_ N\_\_\_

2. Has the exporter notified EPA 60 days prior to the initial shipment? (262.83(b)) Y\_\_\_ N\_\_\_

3. Has the receiving country consented to receive the waste? (citation?) Y\_\_\_ N\_\_\_

4. Has a copy of the EPA Acknowledgment of Consent accompanied the shipment? (citation?) Y\_\_\_ N\_\_\_

5. Did the shipment conform, and was the manifest completed as required by 40 CFR 262.83(c)? (citation?) Y\_\_\_ N\_\_\_

6. Has the exporter received confirmation of delivered shipment? (citation?) Y\_\_\_ N\_\_\_

 If not, was an exception report filed per 262.83(h)? Y\_\_\_ N\_\_\_

7. Are all records kept a minimum of three years? (262.83(i)) Y\_\_\_ N\_\_\_

8. Has the facility imported any hazardous waste? (262.84) Y\_\_\_ N\_\_\_

If so, is the facility a permitted TSDF, or handling excluded hazardous secondary materials? (403.727(1)(a), FS) Y\_\_\_ N\_\_\_

## Condition for Exemption - 40 CFR 262 Subpart L - SQGs Episodic Event \_\_\_\_ N/A

1. If the facility has exceeded the quantity limits for SQGs, did the facility either:

 Comply with applicable LQG requirements in 40 CFR 262.17? (262.16(f)) Y N new

 Or manage the waste in accordance with the provisions of 40 CFR 262 Subpart L? Y N new

2. Does the facility experience no more than 1 episodic event per year? (262.232(b)(1)) Y N new

 If the facility had more than one event, was a petition granted per 262.233? Y N new

3. Did the facility notify using form 8700-12 at least 30 days before a planned event? Y N new

 Did the facility notify within 72 hours of an unplanned event by phone, email or fax? Y N new

 Did the facility submit a form 8700-12 subsequent to notification of an
unplanned event? (262.232(b)(2)) Y N new

4. Did the notification include: (262.232(a)(2)) Y N new

\_\_\_\_ Start date of episodic event? \_\_\_\_ End date of episodic event?
\_\_\_\_ Reason for event? \_\_\_\_ Types and estimated quantity of hazardous waste expected to be generated?
\_\_\_\_ Facility contact? \_\_\_\_ Emergency Coordinator with 24 hour telephone access?

5. Does the SQG have an EPA ID#? (262.232(b)(3)) Y N new

6. Was hazardous waste generated from an episodic event treated on site or manifested for disposal within 60 days of the start of the event? (262.232(b)(5)) Y N \_\_\_ new

7. Was treatment conducted in accordance with land disposal restrictions? (268.7) Y N \_\_\_ new

8. Does the facility maintain records for three years from the event end date that include: (262.232(b)(6)) Y N \_\_\_ new

 \_\_\_\_ (i) beginning and end dates of episodic event? \_\_\_\_ (ii) event description?

 \_\_\_\_ (iii) description of types and quantities of hazardous waste?

 \_\_\_\_ (iv) description of how the hazardous waste was managed and name(s) of the designated facility?

 \_\_\_\_ (v) names of hazardous waste transporters?

 \_\_\_\_ (vi) approval letter if generator petitioned for one additional episodic event in a year per 262.233?

9. Does/did the facility accumulate episodic waste only in containers or tanks? (262.232(b)(4)) Y N new

**If yes, complete applicable sections below for Container or Tank accumulation:**

## SQG Episodic Containers - Complete the following questions for Containers: \_\_\_\_\_ N/A

1. Are the containers in good condition, or if the contents leak are they immediately transferred to a container that is not leaking? (262.16(b)(2)(i)) Y\_\_\_\_ N\_\_\_\_

2. Are the containers made of or lined with materials that will not react with the contents? (262.16(b)(2)(ii)) Y\_\_\_\_ N\_\_\_\_

3. Are the containers closed? (262.16(b)(2)(iii)(A)) Y\_\_\_\_ N\_\_\_\_

4. Are containers holding hazardous waste open, handled or accumulated in a manner as to not cause the container to rupture or leak? (262.16(b)(2)(iii)(B)) Y\_\_\_\_ N\_\_\_\_

5. Are the containers being inspected at least weekly for leaking or deteriorating containers? (262.16(b)(2)(iv)) Y\_\_\_\_ N\_\_\_\_

Are records kept including: (62-730.160(3), FAC)
\_\_\_ Date of inspection?
\_\_\_ Time of inspection?
\_\_\_ Legibly printed name of the inspector?
\_\_\_ Number of containers?
\_\_\_ Condition of containers?
\_\_\_ Notes of observations made?
\_\_\_ Date and nature of any repairs or corrective actions?

6. Is sufficient aisle space provided for inspection of condition and labels of individual containers? (62-730.160(4), FAC) Y\_\_\_\_ N\_\_\_\_

7. Are incompatible wastes or incompatible wastes and materials not stored in the same containers unless 265.17(b) is complied with? (262.16(b)(2)(v)(A)) Y\_\_\_\_ N\_\_\_\_

8. Is hazardous waste placed into an unwashed container that previously held an incompatible waste or material unless 265.17(b) is complied with? (262.16(b)(2)(v)(B)) Y\_\_\_\_ N\_\_\_\_

9. Are containers of hazardous wastes that are incompatible with any waste or other materials that are accumulated nearby in other containers kept separated or protected by means of a dike, berm or other device? (262.16(b)(2)(v)(C)) Y\_\_\_\_ N\_\_\_\_

10. Are containers labeled “Episodic Hazardous Waste? (262.232(b)(4)(i)(A)) Y \_\_\_\_ N \_\_\_\_ new

11. Are containers clearly marked with an indication of the hazard of the contents? (262.232(b)(4)(i)(B)) Y \_\_\_\_ N \_\_\_\_ new

 What system is used?

 Ig. Corr., React., Toxic labels? \_\_\_\_\_\_\_\_\_ DOT label? \_\_\_\_\_\_\_ OSHA pictogram? \_\_\_\_\_\_\_\_

 NFPA labels? \_\_\_\_\_\_\_\_\_\_ Other system? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

12. Are containers clearly marked with the date the episodic event began? (262.232(b)(4)(i)(C)) Y \_\_\_\_ N \_\_\_\_ new

## SQG EpisodicTanks - Complete the SQG Tanks Checklist (separate checklist) and answer the following questions: \_\_\_\_ N/A

1. Are tanks labeled “Episodic Hazardous Waste? (262.232(b)(4)(ii)(A)) Y \_\_\_\_ N \_\_\_\_ new

2. Marked with an indication of the hazards of the contents? (262.232(b)(4)(ii)(B)) Y \_\_\_\_ N \_\_\_\_ new

 Ig. Corr., React., Toxic labels? \_\_\_\_\_\_\_\_\_ DOT? \_\_\_\_\_\_\_ OSHA pictogram? \_\_\_\_\_\_\_\_

 NFPA labels? \_\_\_\_\_\_\_\_\_\_ Other system? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

3. Provided with a way to track the accumulation start date? (262.232(b)(4)(ii)(C)) Y \_\_\_\_ N \_\_\_\_ new

4. Were records documenting the accumulation time on site? (262.232(b)(4)(ii)(D)) Y \_\_\_\_ N \_\_\_\_ new