# VERY SMALL QUANTITY GENERATOR (VSQG) CHECKLIST

**November 2018 Draft**

Facility Name:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Facility ID #: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Facility Representative: Inspector: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Describe the facility's hazardous and potentially hazardous waste streams:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Waste | EPA Waste #s | Generation Rate | Disposal facility? | Proper Waste ID? |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

2. Are the hazardous wastes correctly identified? (40 CFR 262.14(a)(2)) Cond. For Exempt. Y \_\_\_\_ N \_\_\_\_

a. 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\_\_\_

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

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

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

What method:

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

3. Does the facility generate less than or equal to the following amounts of hazardous waste in a calendar month: (262.14(a)(1))

100 kgs (220 lbs) of non-acute hazardous waste? Y \_\_\_\_ N \_\_\_\_

**AND** 1kg (2.2 lbs) of acute hazardous waste listed in 261.31 (hazard code H) or 261.33(e)? Y \_\_\_\_ N \_\_\_\_

**AND** 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 \_\_\_\_

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

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

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

**If no, then then complete SQG or LQG checklist unless activity is covered in below Sections.**

5. Has the facility obtained an EPA ID #? (not required for VSQGs unless experiencing  
an episodic event (40 CFR 262.232(a)(3)) Y \_\_\_\_ N \_\_\_\_

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

7. Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? (40 CFR 262.14(a)(5)) Describe discrepancies in narrative. Y \_\_\_\_ N \_\_\_\_

\_\_\_ Permitted hazardous waste TSDF? \_\_\_ Mixed with used oil? \_\_\_ Site authorized to manage VSQG waste?

\_\_\_ Legitimate Recycling Facility? \_\_\_ LQG under the control of the same person as the VSQG? (Answer questions below)

Note: Florida Solid Waste permits typically prohibit disposal of VSQG hazardous waste in landfills . If facility is claiming one of the federal options below – check receiving state to see if allowed:

\_\_\_ MSW facility subject to 40 CFR Part 258 \_\_\_ Non MSW non hazardous waste disposal unit subject to Part 257

8. Does the facility maintain hazardous waste disposal records for three years? (62-730.030(3), FAC) Y \_\_\_\_ N \_\_\_\_

## Condition for Exemption - VSQGs Episodic Event (262.14(c)) \_\_\_\_ N/A

If the facility has exceeded the quantity limits for VSQGs, did the facility either:

\_\_\_\_ Comply with applicable LQG or SQG requirements? (262.14(a)(3 or 4)) (complete applicable checklists)

\_\_\_\_ Or manage the waste in accordance with the provisions of 40 CFR 262 Subpart L listed below?

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

2. 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? (262.232(a)(2)) Y \_\_\_\_ N \_\_\_\_ new

4. Did the facility notify within 72 hours of an unplanned event by phone, email or fax? (262.232(a)(2)) Y \_\_\_\_ N \_\_\_\_ new

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

6. 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?

7. Did the facility obtain an EPA ID #? (40 CFR 262.232(a)(3)) Y \_\_\_\_ N \_\_\_\_ new

8. Are records kept documenting the accumulation time on site? (262.232(a)(4)(ii)(D)) Y \_\_\_\_ N \_\_\_\_ new

9. Was the hazardous waste generated during an episodic event managed in a manner that minimizes the possibility of a fire, explosion or release of hazardous waste or hazardous waste constituents to the air, soil or water? (262.232(a)(4)(iii)) Y \_\_\_\_ N \_\_\_\_ new

10. Did the facility comply with the manifest provisions? (262.232(a)(5)) Y \_\_\_\_ N \_\_\_\_ new

11. Did the facility ship its hazardous waste to a designated facility within 60 days of the start of the episodic event? (262.232(a)(6)) Y \_\_\_\_ N \_\_\_\_ new

12. Does the facility maintain records for three years that include: (262.232(a)(7)) Y \_\_\_\_ N \_\_\_\_ new

\_\_\_(i) beginning and end dates? \_\_\_ (ii) event description? \_\_\_\_ (iii) description of waste type and quantity?

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

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

13. Did the facility accumulate episodic waste only in containers or tanks?(262.232(a)(4)) Y \_\_\_\_ N \_\_\_\_ new

**Please complete applicable sections below based upon accumulation units:**

## Episodic Containers \_\_\_\_ N/A

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

2. Are containers marked with an indication of the hazards of the contents? (262.232(a)(4)(i)(B)) Y \_\_\_\_ N \_\_\_\_ new

What system is used?

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

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

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

4. Are containers: (262.232(a)(4)(iii)(A)) (new)

\_\_\_\_\_ in good condition? \_\_\_\_\_ compatible with contents? \_\_\_\_\_\_\_ kept closed except to add or remove waste?

## Episodic Tanks \_\_\_\_ N/A

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

2. Are tanks marked with an indication of the hazards of the contents? (262.232(a)(4)(ii)(B)) Y \_\_\_\_ N \_\_\_\_ new

What system is used?

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

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

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

4. Are tanks: (262.232(a)(4)(iii)(B)) (new)

\_\_\_\_\_ in good condition? \_\_\_\_\_\_ compatible with contents? \_\_\_\_\_ inspected daily?

\_\_\_\_\_provided with a means to prevent overflows?

## Condition for Exemption VSQG Waste Managed by an LQG Under the Control of the Same Person

## (262.14(a)(5)(viii)) \_\_\_\_ N/A

1. If the facility is sending hazardous waste to an LQG under the control of the same person as the VSQG, are hazardous waste containers marked with the words “Hazardous Waste?” (262.14(a)(5)((viii)(B)(1)) Y \_\_\_\_ N \_\_\_\_ new

2. Are containers marked with an indication of the hazards of the contents? (262.14(a)(5)(viii)(B)(2)) Y \_\_\_\_\_ N \_\_\_\_ new

What system is used?

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

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