Rev. September 2001

DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE DIVISION

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY:

ADDRESS:

EPA ID NUMBER:

FACILITY
REPRESENTATIVE:

TITLE:

TELEPHONE NUMBER:

INSPECTOR'S NAME:

TITLE:

DATE of INSPECTION:

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling,etc.)

2. Give a brief description of the waste stream(s) (by chemical name, if possible) and hazardous waste code(s) generated by the firm.

3. List (a) the nominal amounts of hazardous waste generated in any

month, and (b) the greatest amounts of all wastes ever accumulated/generated at the site, if applicable to generator category determination (e.g. if a CESQG, have they ever exceeded 1000 kg accumulation, or if a SQG have they ever exceeded 1000 kg/mo generation for all waste streams aggregate).

a) Waste Code Amount Generated

b) Maximum Waste Generation and/or Accumulation
(List quantities, types, and relevant dates)

4. For the evaluation period covered by this inspection:

a) Has the facility generated >1 kg/mo of ACUTE hazardous waste (P-list) Y N

b) Has the facility generated >100 kg of ACUTE hazardous waste from spill clean-up residue? Y N

c) Has the facility accumulated hazardous waste in excess of time and quantity limits established for their generator class? Y N
[Note: a CESQG may not accumulate more than 1000 kg, a SQG may not accumulate more than 6000 kg or accumulate more than 180 days (or 270 days), and a Generator may not accumulate for more than 90 days]

d) Has the facility episodically generated hazardous waste in excess of their normal generator category? Y N
[Note: Applicable generator category requirements apply during the period of generation and for as long as the waste remains on site].

Provide comment for Question 10 evaluation category assignment.

5. How is the waste presently being handled? Where is it sent?
(List all transporters and facilities, or on-site treatment performed).

6. Does the facility generate any hazardous waste Y N
that is excluded from regulation? (e.g., reclaimed on-site, used as a substitute for a CCP, decharacterized by treatment, etc.). If Yes,

list the waste and the basis for exclusion.

7. Used Oil Management:

a) Does the facility generate used oil? On specification only ___
Off-spec/on-spec
___
None ___

b) Does the facility transport used oil ?(notification required) Y
N

c) Does the facility Market or Burn off-specification used oil? Y
N

[If Yes, complete Used Oil Checklist]

d) Does the facility burn used oil in an on-site space heater? Y
N

[Verify compliance requirements and comment]

e) Does the facility mix hazardous waste with used oil? Y
N

If Yes, Is this on-site CESQG HW?
Y N

Is this Ignitible only HW? Y
N

[For any mixing, provide comment and evaluate for Part 279 compliance]

f) Does the facility ensure delivery of used oil to a legitimate used oil reclaimer? Y N

Please specify and list:

g) Used Oil Filters:

Does the generator manage used oil filters? Y N

Does the generator manage these under the filter exclusion language of Part 261.4(b)(13)? Y N

Are the filters managed in such a manner to meet the conditions of the exclusion? Y N

Specify management method(s):

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? Y N

If Yes, list the waste and where it is sent. Verify compliance with Part 266 Subpart F and provide comment.

9. Does the facility generate, transport, store, collect or reclaim Y N spent lead-acid batteries? [Facilities storing lead-acid batteries and reclaiming them on-site are subject to Part B requirements] Specify management method(s):

10. Based on the above preliminary information the facility is considered to be acting as, and is being evaluated for this inspection as, a [underline or circle all applicable]:

a. Conditionally exempt small quantity generator
b. Small quantity generator
c. Generator
d. Permitted or Interim Status TSD
e. Unpermitted TSD (explain in comments section)
f. Transporter
g. Other: please explain below. (If episodic generation has occurred, you will need to assign an appropriate generator category for this evaluation and also assess compliance during the episodic period)

11. List each container and tank accumulation area. Specify the number and capacity of each tank and container type. [Note: Include any satellite accumulation areas and verify compliance with satellite accumulation requirements; if non-compliance, provide comment]

Location	Number of Containers	Number of Tanks (specify size)

12. Comments

13. Waste Management Flow Diagram:

[Sketch a brief, but detailed, flow diagram that includes waste generation processes, any treatment processes, the steps through accumulation/storage and off-site management, including satellite accumulation. Consider all waste streams, including any conditionally excluded hazardous wastes. Include any wastewater treatment units or facilities that may receive either on-site generated or hard-piped hazardous wastes, and verify applicable permits under the CWA].

This section is optional, but should be viewed as critical to understanding complex processes or treatments, waste characterization issues, applicable exemptions/exclusions, and is required to support any actions which may result in enforcement.

CHECKLIST MASTER SUMMARY

NOTE: Includes checklists revised in January 2000.

CHECKLIST NUMBER	TITLE	FILE NAME
CHECKLIST 1.	Reserved for Survey Check Sheet	
CHECKLIST 2.	Permitted Facility	CL2.doc
CHECKLIST 3.	Air Emissions/Equipment Leak	CL3.doc
CHECKLIST 3.A.	Condenser	CL3A.doc
CHECKLIST 3.B.	Thermal Vapor Incinerator	CL3B.doc
CHECKLIST 3.C.	Catalytic Vapor Incinerator	CL3C.doc
CHECKLIST 3.D.	Boiler/Process Heater	CL3D.doc
CHECKLIST 3.E.	Flares	CL3E.doc
CHECKLIST 3.F.	Carbon Adsorbers – Regenerative	CL3F.doc
CHECKLIST 3.G.	Carbon Adsorbers – Non-Regenerative	CL3G.doc
CHECKLIST 4.	Containers	CL4.doc
CHECKLIST 5.	Generator	CL5.doc
CHECKLIST 5.A.	Small Quantity Generator	CL5A.doc
CHECKLIST 6.	Ground-Water Monitoring	CL6.doc
CHECKLIST 7.	Health & Safety	CL7.doc
CHECKLIST 7.A.	Incinerator Health & Safety	CL7A.doc
CHECKLIST 8	Incinerator	CL8.doc
CHECKLIST 9.B.	LDR – TSD Requirements	CL9B.doc
CHECKLIST 9.C.	LDR - Transporter	CL9C.doc
CHECKLIST 10.	Landfills	CL10.doc
CHECKLIST 11.	Land Treatment	CL11.doc
CHECKLIST 12.	Surface Impoundment	CL12.doc
CHECKLIST 13.	Thermal Treatment	CL13.doc
CHECKLIST 14.	Transporter	CL14.doc
CHECKLIST 15.	New Incinerator	CL15.doc
CHECKLIST 16.	Waste Piles	CL18.doc
CHECKLIST 17.	RCRA Waste Minimization	CL17.doc
CHECKLIST 18.	Tanks	CL18.doc
CHECKLIST 18.A.	Tanks – Small Quantity Generator	CL18A.doc

2. PERMITTED FACILITY CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5 SUBPART B	**SECTION A - GENERAL FACILITY STANDARDS**				
264/5.12	1. Has facility received hazardous waste from a foreign source? If yes, has it filed a notice with the Regional Administrator?				
264/5.13	**WASTE ANALYSIS**				
	2. Does facility maintain a copy of the waste analysis plan on-site?				
	a. If yes, does it include:				
264/5.13(b)(1)	1. Parameters for which each waste will be analyzed?				
264/5.13(b)(2)	2. Test methods used to test for these parameters?				
264/5.13(b)(3)	3. Sampling method used to obtain sample?				
264/5.13(b)(4)	4. Frequency with which the initial analyses will be reviewed or repeated?				
264/5.13(b)(5)	5. (For off-site facilities) waste analyses that generators have agreed to supply?				
264/5.13(c)	6. (For off-site facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:				
	a. Procedures to be used to determine the identity of each movement of waste				
	b. Sampling method to be used to obtain representative sample of the waste to be identified.				
264/5.14	3. Does the facility provide adequate security through:				
	a. 24-hour surveillance system (e.g., television monitoring or guards)?				
264/5.14(b)	OR b. 1. Artificial or natural confining barrier around facility (e.g., fence or fence and cliff)? DESCRIBE:				
264/5.14 (b)(2)(ii)	AND 2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
40 CFR 264/5 Subpart E	**SECTION B - MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING**				
264/5.71(a)	4. Does facility receive waste from off-site?				
	a. If yes, does the owner/operator retain copies of all manifests?				
	1. Are the manifests signed and dated and returned to the generator?				
	2. Is a signed copy given to the transporter?				
264/5.71(b)	5. Does the facility receive any waste from a rail or water (bulk shipment) transporter?				
	a. If yes, is it accompanied by a shipping paper?				
	1. Does the owner/operator sign and date the shipping paper and return a copy to the generator?				
	2. Is a signed copy given to the transporter?				
264/5.72	6. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)?				
	a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter?				
	1. If no, has Regional Administrator been notified?				
264/5.73(a)	7. Does the owner/operator keep a written operating record at the facility?				
264/5.73(b)	a. If yes, does it include:				
	1. Description and quantity of each hazardous waste received?				
	2. Methods and dates of treatment, storage, and disposal?				
	3. Location and quantity of each hazardous waste at each location?				
	4. Cross-references to manifests/shipping papers?				
	5. Records and results of waste analyses?				
	6. Report of incidents involving implementation of the contingency plan?				
	7. Records and results of required inspections?				
(Part 264)	8. Monitoring or testing analytical data?				
(Part 264)	9. Closure cost estimates and, for disposal facilities, post-closure cost estimates?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264.12(b)	10. Notices of generators as specified?				
264.73(b)(9)	11. Certification of permittee waste minimization program?				
	12. Land disposal restriction records required by §268.5, §268.6, §268.7(a), and §268.8, as applicable? (§264.73(b)(10)-(16))				
264/5.75	8. Does the facility submit a biennial report by March 1 every even-numbered year?				
	a. If yes, do reports contain the following information:				
264/5.75(a)	1. EPA I.D. number?				
264/5.75(b)	2. Date and year covered by report?				
264/5.75(d)	3. Description/quantity of hazardous waste?				
264/5.75(e)	4. Treatment, storage, and disposal methods?				
265.75(f)	5. Monitoring data under §265.94(a)(2) and (b)(2)?				
264/5.75(g)	6. Most recent closure and post-closure cost estimates?				
264/5.75(h)	7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?				
264/5.75(j)	8. Certification signed by owner/operator?				
264/5.76	9. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest?				
	a. If yes, has he submitted an unmanifested waste report to the Regional Administrator?				
264/5.77	10. Does the facility submit to the Regional Administrator reports on releases, fires, and explosions; contamination and monitoring data; and facility closure?				

COMMENTS:

3. AIR EMISSIONS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.1030	**SECTION A - APPLICABILITY**				
	1. Does the facility have units permitted under Part 270 or is it permitted under Part 270?				
	a. What is the effective date for this facility?				
	b. For interim status facilities, have these requirements been incorporated into Part B application submittal?				
	2. Are there any of the following separation processes at the facility:				
	a. Distillation?				
	b. Fractionation?				
	c. Thin-film evaporation?				
	d. Solvent extraction?				
	e. Air stripping?				
	f. Steam stripping?				
	SECTION B - WASTE STREAMS				
264/5.1032(a)	3. Are there waste streams associated with any separation processes that contain 10 ppmw or greater organic concentration?				
264/5.1034 (d)(1 or 2)	a. If they claim waste streams below 10 ppmw, did they use proper means to determine concentration?				
264/5.1034 (e)	b. Was date of initial determination before their effective date?				
264/5.1034 (e)(2 or 3)	c. Were other analyses performed annually or upon changes in waste streams?				
	SECTION C - FACILITY EMISSIONS RATES				
264/5.1032 (a)	4. Is the hourly process vent organic emission rate greater than or equal to 3 lb/hr?				
264/5.1032 (a)	Is the yearly process vent organic emission rate greater than or equal to 3.1 tons/yr?				
	a. If performance tests were made, were they done according to §§ 264/5.1034(c)?				
	b. If engineering calculations were used, were they done according to 264/5.1035(b)(2)(ii)?				
264/5.1035 (b)(4)(iv)	c. Has the owner/operator signed a statement that test conditions portray peak capacity operating conditions?				
	d. Were the facility emissions rates determined by the effective date?				
	SECTION D - FACILITY EMISSION RATES AFTER CONTROL DEVICES OR CHANGE IN OPERATIONS				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.1032 (a)	5. a. Are the process vent organic emission rates for the facility less than or equal to 3 lb/hr and less than or equal to 3.1 tons/year or are they reduced by 95%?				
	b. If performance tests were used, were they done in accordance with §§264/5.1034(c) and was the test plan in accordance with §§264/5.1035(b)(3)?				
	c. If engineering calculations were used, were they in accordance with §§264/5.1035(b)(4)?				
264/5.1033 (a)(2) and 264/5.1035 (b)(1)	d. For facilities without the control devices installed, do they have an installation plan?				
264/5.1033	e. Will the control devices be installed by 18 months after the effective date?				
264.1036	**SECTION E - REPORTING**				
	6. For facilities with final permits incorporating this rule, have they sent in semi-annual reports of exceedances lasting longer than 24 hours?				

SUMMARY SHEET FOR CONTROL DEVICES (CD)

CONTROL DEVICE	CD #	UNIT #	VENTS #
Condenser			
Adsorber (Regen)			
Adsorber (Nonreg)			
Process Heater			
Boiler			
Catalytic Vapor Incinerator			
Thermal Vapor Incinerator			
Air Assisted Flare			
Steam Assisted Flare			
Nonassisted Flare			

NOTE: COMPLETE THE APPLICABLE CONTROL DEVICE CHECKLIST.

EQUIPMENT LEAK APPLICATIONS

CITATION	REGULATION	YES	NO	NA	NC
264/5.1050	**SECTION A - APPLICABILITY**				
	1. Is the facility permitted under Part 270 or does it have units permitted under Part 270?				
	a. Facility status: interim status or permitted?				
	b. What is the effective date for this facility?				
	2. Are any of these units exempt?				
264/5.1063(d)	**SECTION B - WASTE STREAMS**				
	3. Are there waste streams that contain at least 10% organics by weight?				
	a. Method of determination? Knowledge, ASTM Methods D2267-88, E169-87, E168-88, E260-85 or Method 9060 or 8240				
	b. If knowledge, is it documented?				
	c. Date of initial determination				
	d. Dates of other analysis? Change, batch				
	4. For each waste stream that does qualify, determine fluid type (gas/vapor service, light-liquid service, heavy liquid service):				
	a. Method for determining light liquid service				
	1. vapor pressures of constituents from standard texts, or				
	2. ASTM D-2879-86				
264/5.1064(g)	**SECTION C - FACILITY OPERATING RECORD**				
	5. Does the facility have a list of the equipment and identification numbers that are affected by this rule?				
	6. Is there a list of the ID numbers of NDE pumps, valves, and compressors with signature of owner/operator?				
	7. Is there a list of all affected equipment by designation?				
	8. Is there a list of pressure relief devices in gas/vapor service?				
	9. Dates of test for no detection emission equipment? Background level Maximum instrument reading				
	10. Is there a list of ID numbers for equipment in vacuum service?				
	11. List of ID numbers of "unsafe-to-monitor" and "difficult-to-monitor" valves, with explanation for each and plan for monitoring or schedule.				

CITATION	REGULATION	YES	NO	NA	NC
	12. Is there a list of valves using the skip period alternative monitoring schedule, with schedule for monitoring and % leaking determined?				
	13. For dual mechanical seal pumps or compressors with barrier fluid systems with sensors, is the criteria and explanation of the criteria for determining sensor failure given?				
	14. Is there an analysis of design capacity, influent/effluent for each unit subject to these requirements, and an up-to-date analysis either by testing or knowledge to determine if the equipment is covered or not?				

COMMENTS:

IDENTIFICATION OF EQUIPMENT COVERED BY RULE

EQUIPMENT	EQUIP ID #	WASTESTREAM #	FLUID
PUMPS			
General			
Dual Mechanism			
NDE (seal-less)			
Closed vent/control devices			
COMPRESSORS			
General			
NDE (seal-less)			
CV/Control devices			
SAMPLING CONNECTING SYSTEMS			
General			
Insitu			
VALVES			
General			
Leakless (NDE)			
Unsafe to monitor			
Difficult to monitor			
Alter allowable %			
OPEN-ENDED VALVES OR LINES			
FLANGES AND OTHER CONNECTORS			

CITATION	REGULATION	YES	NO	NA	NC
	12. Is there a list of valves using the skip period alternative monitoring schedule, with schedule for monitoring and % leaking determined?				
	13. For dual mechanical seal pumps or compressors with barrier fluid systems with sensors, is the criteria and explanation of the criteria for determining sensor failure given?				
	14. Is there an analysis of design capacity, influent/effluent for each unit subject to these requirements, and an up-to-date analysis either by testing or knowledge to determine if the equipment is covered or not?				

COMMENTS:

IDENTIFICATION OF EQUIPMENT COVERED BY RULE

EQUIPMENT	EQUIP ID #	WASTESTREAM #	FLUID
PUMPS			
General			
Dual Mechanism			
NDE (seal-less)			
Closed vent/control devices			
COMPRESSORS			
General			
NDE (seal-less)			
CV/Control devices			
SAMPLING CONNECTING SYSTEMS			
General			
Insitu			
VALVES			
General			
Leakless (NDE)			
Unsafe to monitor			
Difficult to monitor			
Alter allowable %			
OPEN-ENDED VALVES OR LINES			
FLANGES AND OTHER CONNECTORS			

RECORDKEEPING REQUIREMENTS (264/5 (b)(1) and (g))

Unit Number Listed
Equipment Identification Number Listed
Location at Facility
Type of Equipment
% by weight of TOC at equipment
Fluid State at Equipment
Equipment Designation
If Closed-Vent/Control Device Used (264/5.1064(b)
(2-4)
- Implementation Plan
- If testing, performance test plan
- Design Documentation or Perf. Test Results

If Control Device; monitoring, operating, inspection data (264/5.1064(e))

LEAK DETECTION AND REPAIR RECORDKEEPING (264/5.1064 (c and d))

Monitoring Equipment Number
Monitoring Operators Identification
Date of Visual, Audible, Olfactory Indication of Leak
Date of Leak Detection
Date of Repair Attempt
Repair Methods at each attempt
Leak "Above 10,000" or Above 500 above background
"Repair Delayed" if after 15 days
If valve, documentation for repair delay
Signature of Person approving delay
Expected Date of Repair
Date of Successful Repair

PHYSICAL INSPECTION

Visual, Audible, or Olfactory Indication of Leak
Monitoring Equipment Number
Correct Calibration Method
Correct Monitoring Techniques Used
Method 21 Results
Tag on Leaking Equipment
If Equipment already had tag on it:
- Date Leak Detected
- Date of Expected Repair or Actual Repair

Equipment Marked as Being in this Program

3.A. CONDENSER

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.1035 (b)(4)(iii)(E) 264/5.1035 (b)(2)(ii)	1. Operating Parameters: List the operating parameters and the limits set for each condenser in the permit, or for interim status facilities, the limits the facility gave based on their engineering calculations or performance tests. Operating Parameter Limit				
	a. Have they met these limits?				
264/5.1035(c)	b. Is all design documentation, monitoring, operating, and inspection information in the facility operating record?				
	2. Does the monitoring contain: **a.** and either **b.** or **c.**				
264/5.1033 (f)(1)	a. Flow indicator				
	1. records hourly				
	2. installation point correct				
264/5.1033 (f)(3)	3. daily inspection				
	AND b. [Organic compound] in condenser exhaust vent stream				
264/5.1033 (f)(2)(vi)(A)	1. continuously record				
264/5.1033 (f)(3)	2. daily inspection				
264/5.1033 (f)(2)(vi)(B)	OR c. Temperature monitoring device				
	1. continuously record				
	2. two locations:				
	a. exhaust vent stream from condenser				
	b. coolant fluid exiting the condenser				
	3. accuracy:				
	a. +/- 1% of temperature being monitored in CO				
	OR b. .5 degrees C (whichever is greater)				
264/5.1033 (f)(3)	4. inspect daily				
264/5.1033 (f)(3)	3. Repair immediately upon daily inspection				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.1035 (c)(4)(vi or vii)	4. Exceedances:				
	a. If monitoring [organic] in exhaust:				
	1. when [organic] greater than 20% above design outlet [organic]				
	b. If monitoring T:				
	1. either T exhaust greater than 6 deg above design avg exhaust T				
	OR 2. T coolant out greater than 6 deg above design avg coolant T				
	c. Cause of exceedance given				
	d. Measure taken to correct cause provided				
264/5.1033(j)	5. Closed-vent systems associated with the control device:				
	a. Standard: No detectable emissions and no visual emissions				
	b. Monitor: At facility effective date				
	Annually				
	RA requested times				
	c. Repair: Start by 5 days/complete by 15				

COMMENTS:

3.B. THERMAL VAPOR INCINERATOR

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.1035 (b)(4)(iii)(B) 264/5.1035 (b)(2)(ii)	1. Operating Parameters: List the operating parameters and the limits set for each thermal vapor incinerator in the permit, or for interim status facilities, the limits the facility gave based on their engineering calculations or performance tests. Operating Parameter Limit				
	a. Have they met these limits?				
264/5.1035(c)	b. Is all design documentation, monitoring, operating, and inspection information in the facility operating record?				
	2. Does the monitoring contain: **a.** and **b.**?				
264/5.1033 (f)(1)	a. Flow indicator				
	1. records hourly				
	2. installation point correct				
264/5.1033 (f)(3)	3. daily inspection				
264/5.1033 (f)(2)(i)	b. Temperature monitoring device				
	1 continuously record				
	2. one location:				
	a. in combustion chamber downstream of combustion zone				
	3. accuracy:				
	a. +/- 1% of temperature being monitored in CO				
	OR b. .5 degrees C (whichever is greater)				
264/5.1033 (f)(3)	4. inspect daily				
	3. Repair:				
264/5.1033 (f)(3)	a. Immediately upon daily inspection				
264/5.1035 (c)(4)(i or ii)	4. Exceedances:				
	a. If monitoring RT min:				
	1. when T less than 760 deg. C				
	b. If standard 95% eff:				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	1. when T comb. zone greater than 28 deg. C below given design avg. comb zone T				
	c. Cause of exceedance given				
	d. Measures taken to correct cause provided				
264/5.1033(j)	5. Closed-vent systems associated with the control device :				
	a. Standard: No detectable emissions and no visual emissions				
	b. Monitor: At facility effective date				
	Annually				
	RA requested times				
	c. Repair: Start by 5 days/complete by 15				

COMMENTS:

3.C. CATALYTIC VAPOR INCINERATOR

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.1035 (b)(4)(iii)(C) 264/5.1035 (b)(2)(ii)	1. Operating Parameters: List the operating parameters and the limits set for each catalytic vapor incinerator in the permit, or for interim status facilities, the limits the facility gave based on their engineering calculations or performance tests. Operating Parameter Limit				
	a. Have they met these limits?				
264/5.1035(c)	b. Is all design documentation, monitoring, operating, and inspection information in the facility operating record?				
	2. Does the monitoring contain: **a.** and **b.**?				
264/5.1033 (f)(1)	a. Flow indicator				
	1. records hourly				
	2. installation point correct				
264/5.1033 (f)(3)	3. daily inspection				
264/5.1033 (f)(2)(ii)	b. Temperature monitoring device				
	1. continuously record				
	2. two locations:				
	a. vent stream at the nearest feasible point to catalyst bed inlet				
	b. vent stream at the nearest point feasible to catalyst bed outlet				
	3. accuracy:				
	a. +/- 1% of temperature being monitored in CO				
	OR b. +/- .5 degrees C (whichever is greater)				
264/5.1033 (f)(3)	4. inspect daily				
	3. Repair:				
264/5.1033 (f)(3)	a. Immediately upon daily inspection				
264/5.1035 (c)(4)(iii)(A or B)	4. Exceedances :				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	a. T inlet greater than 28 deg. C below design avg. T inlet or				
	b. T diff. across bed less than 80% design avg. T difference				
	c. cause of exceedance given				
	d. measures taken to correct cause provided				
264/5.1033(j)	5. Closed-vent systems associated with the control device:				
	a. Standard: No detectable emissions and no visual emissions				
	b. Monitor: At facility effective date				
	Annually				
	RA requested times				
	c. Repair: Start by 5 days/complete by 15				

COMMENTS:

3.D. BOILER/PROCESS HEATER

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.1035 (b)(4)(iii)(C) 264/5.1035 (b)(2)(ii)	1. Operating Parameters: List the operating parameters and the limits set for each thermal boiler/process heater in the permit, or for interim status facilities, the limits the facility gave based on their engineering calculations or performance tests. Operating Parameter Limit				
	a. Have they met these limits?				
264/5.1035(c)	b. Is all design documentation, monitoring, operating, and inspection information in the facility operating record?				
	2. Does the monitoring contain: **a.** and **b.** and **c.**?				
264/5.1033 (f)(1)	a. Flow indicator				
	1. records hourly				
	2. installation point correct				
264/5.1033 (f)(3)	3. daily inspection				
	AND b. If design heat input capacity less than 44 MW:				
264/5.1033 (f)(iv)	1. temperature monitoring device				
	2. continuously record				
	3. one location:				
	a. in furnace downstream of combustion zone				
	4. accuracy:				
	a. +/- 1% of temperature being monitored				
	OR b. .5 degrees C (whichever is greater)				
264/5.1033 (f)(3)	5. inspect daily				
	OR c. If design heat input capacity => 44 MW:				
264/5.1033 (f)(v)	1. continuously record				
	2. parameter that indicates good combustion practices				
264/5.1033 (f)(3)	3. inspect daily				
	3. Repair:				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.1033 (f)(3)	a. immediately upon daily inspection				
264/5.1035 (c)(4)(iv)	4. Exceedances :				
	a. T flame zone > 28 deg. C below design avg. flame zone T				
	b. Position changes where vent stream is introduced				
	c. Cause of exceedance given				
	d. Measures taken to correct cause provided				
264/5.1033(j)	5. Closed-vent systems associated with the control device:				
	a. Standard: No detectable emissions and no visual emissions				
	b. Monitor: At facility effective date				
	Annually				
	RA requested times				
	c. Repair: Start by 5 days/complete by 15				

COMMENTS:

3.E. FLARES

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.1035 (b)(4)(iii)(D) 264/5.1033(d) 264/5.1035 (b)(2)(ii)	1. Operating Parameters: List the operating parameters and the limits set for each flare in the permit, or for interim status facilities, the limits the facility gave based on their engineering calculations or performance tests. Operating Parameter Limit				
	a. Have they met these limits?				
264/5.1035(c)	b. Is all design documentation, monitoring, operating, and inspection information in the facility operating record?				
264/5.1033(d)	2. Standard				
	a. No visible emissions, except for period not to exceed 5 minutes/any consecutive 2 hrs				
	b. Flame present at all times				
	c. If steam assisted:				
	1. Ve < 60 ft/s and Ht > 300 BTU/scf				
	OR 2. 60 ft/s < Ve < 400 ft/sec and Ht > 1000 BTU/scf				
	3. Ve < Vmax < 400 and Ht > 300 BTU/scf				
	d. If air-assisted: Ve< Vmax and Ht => 300 BTU/scf				
	e. If non-assisted:				
	OR 1. Ve < 60 ft/sec and Ht => 200 BTU/scf				
	2. 60 units < Ve < 400 ft/sec and Ht > 1000 BTU/scf				
	3. Ve < Vmax < 400 units and Ht > 200 BTU/scf				
	3. Monitoring: **a.** and **b.**				
264/5.1033 (f)(1)	a. Flow indicator				
	1. records hourly				
	2. installation point				
264/5.1033 (f)(3)	3. daily inspection				
264/5.1033 (f)(2)(iii)	b. Heat sensing device for continuous ignition of pilot flame				
	1. continuously record				
264/5.1033 (f)(3)	2. inspect daily				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	3. Repair:				
264/5.1033 (f)(3)	a. Immediately upon daily inspection				
264/5.1035 (c)(4)(v)	4. Exceedances:				
	a. Period when pilot flame is not ignited				
	b. Cause of exceedance given				
	c. Measures taken to correct cause provided				
264/5.1033(j)	5. Closed-vent systems associated with the control device :				
	a. Standard: No detectable emissions and no visual emissions				
	b. Monitor: At facility effective date				
	Annually				
	RA requested times				
	c. Repair: Start by 5 days/complete by 15				

COMMENTS:

3.F. CARBON ADSORBERS – REGENERATIVE

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.1035 (b)(4)(iii)(d) 264/5.1033(d) 264/5.1035 (b)(2)(ii)	1. Operating Parameters: List the operating parameters and the limits set for each thermal vapor incinerator in the permit, or for interim status facilities, the limits the facility gave based on their engineering calculations or performance tests. Operating Parameter Limit				
	a. Have they met these limits?				
264/5.1035(c)	b. Is all design documentation, monitoring, operating, and inspection information in the facility operating record?				
	2. Does the monitoring contain: **a.**, **b.**, **c.**, and **d.**?				
264/5.1033 (f)(1)	a. Flow indicator				
	1. records hourly				
	2. installation point correct				
264/55.1033 (f)(3)	3. daily inspection				
	b. [Organic compound] in carbon bed exhaust vent stream,				
264/5.1033 (f)(2)(vii)	1. continuously record				
	2. daily inspection				
	c. Device to measure a parameter that indicates regeneration on a regular, predetermined time cycle				
	1. continuously record				
	2. inspect daily				
	d. Replace carbon at regular, predetermined time interval that is < carbon service life (§§264/5.1033(g))				
264/5.1033 (f)(3)	3. Repair immediately upon daily inspection				
264/5.1035 (c)(4)(viii and ix)	4. Exceedances:				
	a. If [organic compound]:				
	(i) [org] exhaust >20% above design exhaust vent				
	(ii) stream [org]				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	b. If parameter for regen. on regular cycle				
	(i) flow continuous past predetermined reg. time?				
	c. Cause of exceedance given?				
	d. Measures taken to correct cause for exceedance?				
	5. Have §§264/5.1035(c)(6) or (7) been met?				
264/5.1033(j)	6. Closed-vent systems associated with the control device				
	a. Standard: No detectable emissions and no visual emissions				
	b. Monitor: At facility effective date				
	Annually				
	RA requested times				
	c. Repair: Start by 5 days/complete by 15				

COMMENTS:

3.G. CARBON ADSORBERS – NONREGENERATIVE

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.1035 (b)(4)(iii)(D) 264/5.1033(d) 264/5.1035 (b)(2)(ii)	1. Operating Parameters: List the operating parameters and the limits set for each in the permit, or for interim status facilities, the limits the facility gave based on their engineering calculations or performance tests. Operating Parameter Limit				
	a. Have they met these limits?				
264/5.1035(c)	b. Is all design documentation, monitoring, operating, and inspection information in the facility operating record?				
	2. Monitoring: **a.** and either **b.** or **c.**				
264/5.1033 (f)(1)	a. Flow indicator				
	1. records hourly				
	2. installation point				
264/5.1033 (f)(3)	3. daily inspection				
264/5.1033(g)	AND b. Organic compound in exhaust vent stream				
	1. monitor on regular basis				
	2. inspect daily or at time < 20% time carbon life(which is longer)				
	3. replace carbon when carbon breakthrough indicated				
	OR c. Replace carbon at regular predetermined time interval less than design carbon replacement interval				
264/5.1033 (f)(3)	3. Repair immediately upon daily inspection?				
264/5.1035 (c)(4)(viii and ix) 1035(c)(6), (7)	4. Exceedances for non-regenerators				
	a. If monitoring [organic] in exhaust:				
	(i) date and time when monitored for breakthrough and reading				
	(ii) date when carbon is replaced with fresh carbon				
	b. Cause of exceedance given				
	c. Measures taken to correct cause provided				
	5. Have 264/5.1035(c)(6)(7) been met?				

40 CFR CITATION	REGULATION			YES	NO	NA	NC
	6.	Closed-vent system:					
		a. Standard:	No detectable emissions and no visual emissions				
		b. Monitor:	At facility effective date				
			Annually				
			RA requested times				
		c. Repair:	Start by 5 days/complete by 15				

COMMENTS:

4. CONTAINERS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATATION	REGULATION	YES	NO	NA	NC
	SECTION A - USE AND MANAGEMENT				
264/265.171	1. Are containers in good condition?				
	SECTION B - COMPATIBILITY OF WASTE WITH CONTAINER				
264/265.172	2. Is container made of a material that will not react with the waste which it stores?				
	SECTION C - MANAGEMENT OF CONTAINERS				
264/265.173(a)	3. Is container always closed while holding hazardous waste?				
264/265.173(b)	4. Is container not opened, handled, or stored in a manner, which may rupture it or cause it to leak?				
	SECTION D – INSPECTIONS				
264/265.174	5. Does owner/operator inspect containers at least weekly for leaks and deterioration?				
	SECTION E – IGNITABLE AND REACTIVE WASTES				
264/265.176	6. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines?				
	PERMITTED FACILITIES ONLY				
	SECTION F – INCOMPATIBLE WASTE				
264/265.177(a)	7. Are incompatible wastes or materials placed in the same containers?				
264/265.177(b)	8. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?				
264/265.177(c)	9. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?				
	SECTION G – CLOSURE				
264.175	10. Do container storage areas have a containment system?				
264.178	11. At closure, were all hazardous wastes and associated residues removed from the containment system?				

COMMENTS:

5. VIRGINIA SPECIFIC CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
9 VAC 20-60-261 B.5	**FOR CESQGs DISPOSING OF HAZARDOUS WASTE IN SOLID WASTE LANDFILLS**				
	1. If the generator has disposed of or managed hazardous waste at a solid waste or Subtitle D landfill, has the generator first obtained written permission from the landfill and the Department?				
9 VAC 20-60-262 B.4	**GENERATOR/TSD NOTIFICATION OF ACCUMULATION AREAS**				
	2. Has the generator or TSD facility notified the Department of the exact location of his accumulation areas (note: satellite areas are excluded) at least 15 days prior to the establishment of the area?				
9 VAC 20-60-261 B.8	**MANAGEMENT OF LOW-LEVEL RADIOACTIVE WASTE**				
	3. Does the facility generate radioactive wastes defined as low-level radioactive materials by the USNRC, or does the facility generate "mixed wastes" consisting of the above and listed hazardous wastes, or which exhibits a characteristic of a hazardous waste?				
	SPECIFY WASTE -- LIST HAZARDOUS WASTE CLASSIFICATION AND RADIONUCLIDES				
	4. Does the generator manage his mixed or low-level radioactive wastes in accordance with the general requirements for hazardous waste management specific to his generator category ?				
	Please specify: NOTE: Low-level and "mixed" low-level radioactive wastes are classified as "hazardous wastes" by the Virginia regulations, and must be managed in accordance with applicable generator category requirements as specified on the general checklists				
9 VAC 20-60-264 B.12 and 9 VAC 20-265 B.13	**WOOD PRESERVER DRIP PAD MANAGEMENT** **Also complete applicable checklists for generator category and additional subpart W requirements.**				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	5. Does the facility operate (check all that apply):				
	Existing HSWA drip pads contracted or constructed before 12/6/90?				
	Existing non-HSWA drip pads contracted or constructed before 1/14/93?				
	New drip pads (all other)?				
	6. For all applicable, has the owner/operator installed a leak collection system:				
	a. For HSWA drip pads constructed after 12/24/92?				
	b. For non-HSWA drip pads constructed after 9/8/93?				
	c. For all new drip pads?				
	NOTE: If "No" to the above, this is a POTENTIAL VIOLATION. Please specify:				
PART XVI	**STATE DECLARED UNIVERSAL WASTE MANAGEMENT** In addition to the general requirements for Universal Waste Handlers (9 VAC 20-60-260 and 9 VAC 20-60-273), if the generator manages state declared universal wastes (Mercury containing lamps) verify compliance with the following state specific requirements:				
9 VAC 20-60-1495	7. Universal waste declaration -- has the generator chosen to manage his mercury containing lamps:				
	a. Under the general provisions for hazardous waste?(HW requirements)				
	b. Or, the special universal waste provisions?(Universal waste requirements)				
	c. Or, has not specified a management plan or made a declaration? (HW determination and management requirements apply.)				
	d. Or, as a CESQG waste?(characterization required)				
	NOTE: If the generator does not actively manage his mercury containing lamp waste as a universal waste, or if it is CESQG waste managed with other solid waste, then it must be characterized under the general requirements of 9 VAC 20-60-261.				
9 VAC 20-60-1505 C.1	8. Does the generator manage universal waste mercury containing lamps in accordance with the general requirements for universal waste handlers?				
9 VAC 20-60-1505 C.2	9. Does the generator manage the universal waste to prevent constituent releases to the environment by:				
	a. Containing unbroken lamps in packaging that will minimize breakage?				
	b. Containing broken lamps in packaging the will minimize release of fragments and residues?				
	c. Otherwise managing lamps so as to minimize breakage (specify)?				
	To be in compliance, one or more of the above must be "yes", otherwise.				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	And: d. Immediately containing all releases of residues?				
	e. Determining if any released material or clean-up residue or other waste generated from lamp management is a hazardous waste?				
	If either of the above are "no", this is a POTENTIAL VIOLATION. Please specify details of release/determination:				
	10. Does the generator crush mercury containing lamps on-site?				
9 VAC 20-60-1505 C.3	a. If "yes", then are the lamps crushed in a device which is a mechanical unit designed for such use?				
	b. Is operated so as to minimize release of mercury to the workplace and the environment and is in compliance with 29 CFR 1910.1000?				
	c. Has a documented procedure for operation?				
	d. Is equipped with containment and filtration of process air flows to remove mercury-containing vapors and dusts?				
	If any if the above are "no," this is a POTENTIAL VIOLATION.				
9 VAC 20-6-1505 C.4	11. In addition to the general marking and labeling requirements for Universal Wastes, are waste mercury containing lamps and containers marked or labeled with the words "Universal Waste Mercury-containing lamps", or, "Waste Mercury-containing Lamps", or, "Used Mercury-containing Lamps"?				

COMMENTS:

5. GENERATORS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	SECTION A – MANIFEST				
262.20	1. Does generator ship waste off-site?				
262.20	2. Does generator use manifest?				
	a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month?) NOTE: SQGs are only exempt if wastes are reclaimed. (See §262.20(e).)				
	1. If yes, does generator indicate this when sending waste to a TSD facility?				
Part 262 Appendix	b. If yes, does manifest include the following information?				
	1. Manifest document no.				
	2. Generator's name, mailing address, telephone no.				
	3. Generator EPA I.D. no.				
	4. Transporter Name(s) and EPA I.D. no.(s)				
	5. Facility name, address, and EPA I.D. no.				
	6. Alternate facility name, address, and EPAI.D. no.				
	7. Instructions to return to generator if undeliverable				
	8. Waste information required by DOT – shipping name, quantity (weight or vol.), containers (type and number)				
	9. Emergency information (optional) (special handling instructions, telephone no.)				
	10. Is the following certification on each manifest form? "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable national and international regulations."				
262.40	11. Does generator retain copies of manifests? If yes, complete a through g. (§262.23)				
	a. Did generator sign and date all manifests?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	b. Did generator obtain handwritten signature and date of acceptance from initial transporter?				
262.40	c. Does generator retain one copy of manifest signed by generator and initial transporter?				
262.40	d. Do returned copies of manifest include facility owner/operator signature and date of acceptance?				
262.42	12. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago?				
	a. If no, has the generator filed an exception report?				
	b. Does the exception report include:				
	1. a legible copy of the manifest for which the generator does not have confirmation of the delivery? and				
	2. a cover letter explaining the efforts taken to locate the shipment?				
262.11	**SECTION B – HAZARDOUS WASTE DETERMINATION**				
	3. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)?				
	4. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, TC)?				
	a. Does generator determine characteristics by testing or by applying knowledge of processes?				
	1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)?				
262.11	5. Has the generator evaluated all solid wastes to determine whether the solid wastes are hazardous wastes?				
	SECTION C – PRETRANSPORT REQUIREMENTS				
262.30	6. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)?				
	a. Are containers to be shipped leaking or corroding?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	b. Complete **Checklist 4. Containers** to evaluate condition of containers.				
	c. Is there evidence of heat generation from incompatible wastes in the containers?				
262.31	7. Does generator follow DOT labeling requirements in accordance with 49 CFR 172?				
262.32	8. Does generator mark each package in accordance with 49 CFR 172?				
262.32	9. Is each container of 110 gallons or less marked with the following label? HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.				
	a. Generator name(s) and address(es)				
	b. Manifest document No.				
262.33	10. Does generator have placards to offer to transporters?				
262.34	11. Accumulation time				
	a. Are containers used to temporarily store waste before transport?				
262.34(a)(2)	1. If yes, is each container clearly dated.				
262.34(a)(3)	2. If yes, is each container labeled or clearly marked with the words "Hazardous Waste?"				
262.34(c)(1)	12. Does the generator have satellite accumulation areas where up to 55 gallons of any one type of hazardous waste (HW) (1qt acutely HW) are accumulated? If yes,				
262.34 (c)(1)(ii)	a. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?				
262.34(c)(1)	13. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,				
amount	a. Has the generator marked the excess amount with the date the excess began accumulating? and				
	b. Has the generator either removed the excess amount within three days of the date of excess accumulation or has the generator complied with all other provisions for accumulation areas. Namely, has the generator notified the Executive Director about the location of the accumulation area?				
262.40	**SECTION D – RECORDKEEPING AND RECORDS**				
	14. Does generator keep the following reports for 3 years?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	a. Manifest or signed copies from designated facilities				
	b. Biennial reports				
	c. Exception reports				
	d. Test results				
	16. Where are the records kept (at facility or elsewhere)?				
	SECTION E – SPECIAL CONDITIONS				
	17. Has the primary exporter received from or transported to a foreign source any hazardous waste?				
262.53	a. If yes, has he filed a notice with the Regional Administrator?				
262.54	b. Is this waste manifested and signed by a foreign consignee?				
262.54	c. If generator transported wastes out of the country, has he received confirmation of delivered shipment?				
268	**SECTION F – LDR REQUIREMENTS**				
	18. Does the facility generate, transport, treat, store or dispose any land-restricted wastes?				
	19. Is land disposal of wastes occurring? If yes,				
	a. Has the facility been granted an extension to the effective date for land restriction applicable to its restricted waste? OR				
	b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR				
	c. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?				
268.5	22. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?				
268.6	23. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?				
268.3	24. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
268.4	25. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)				
	26. If yes, complete **Check Sheet 12. Surface Impoundments.**				
	27. Is the facility treating waste in Tanks or Containers in order to meet applicable treatment standards under 268.40?				
268.7(a)(4)	28. If Yes, has the facility developed a Waste Analysis Plan?				
268.7(a)(4)(ii)	29. Has the Waste Analysis Plan been filed with the Director a minimum of 30 days prior to the treatment activity?				
268.7(a)(1)	30. Restricted wastes, which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?				
	31. Did the notification include the following information:				
268.7(a)(1)(i)	a. EPA Hazardous Waste Number?				
268.7(a)(1)(ii)	b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents?				
268.7(a)(1)(iii)	c. The manifest number associated with the shipment of waste? and				
268.7(a)(1)(v)	d. Waste analysis data, where available?				
268.7(a)(2)	32. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions set forth in 268.32 or RCRA section 3004(d)?				
	33. Did the notification include the following information:				
268.7 (a)(2)(i)(A)	a. EPA Hazardous Waste Number?				
268.7 (a)(2)(i)(B)	b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents?				
268.7 (a)(2)(i)(C)	c. The manifest number associated with the shipment of waste? And				
268.7 (a)(2)(i)(D)	d. Waste analysis date, where available?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
268.7(a)(2)(ii)	34. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."				
268.7(a)(3)	35. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?				
268.7(a)(7)	36. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?				
	37. Is the generator storing land restricted waste? (For one year storage only)				
	38. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?				

COMMENTS:

5.A. SMALL QUANTITY GENERATOR CHECKLIST

40 CFR CITATION	REGULATION	YES	NO	NA	NC
262.34(d)(1)	1. Does the generator ever accumulate a quantity of hazardous waste greater than 6,000 kilograms? (If YES, then use 5. Generator Checklist or Unauthorized Facility Checklist.)				
262.34(d) 262.34(e) 262.34(f) 265.201	2. Does the small quantity generator accumulate hazardous waste for greater than 180 days (or 270 days if the disposal facility is greater than 200 miles away)? If YES, then use **2. General Facility Checklist.**				
	PRE-TRANSPORT REQUIREMENTS				
265.32(a)as referenced by 262.34(d)(4)	3. Does the generator have an internal communication or alarm system capable of providing immediate emergency instruction to facility personnel?				
265.32(b) as referenced by 262.34(d)(4)	4. Does the generator have a device such as a telephone or two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or Commonwealth or local emergency response teams?				
265.32(c) as referenced by 262.34(d)(4)	5. Does the facility have portable fire extinguishers, fire control equipment, and decontamination equipment?				
265.32(d) as referenced by 262.34(d)(4)	6. Is there water at adequate volume and pressure to supply expected fire demands?				
265.33 as referenced by 262.34(d)(4)	7. Does the facility test and maintain the equipment in the previous four questions as necessary to assure proper operation?				
	8. Is a log maintained of these inspections?				
265.35 as referenced by 262.34(d)(4)	9. Is there adequate aisle space to allow the unobstructed movement of personnel, fire protection, spill control, and decontamination equipment to any area of the facility?				
265.37	10. Has the facility attempted to arrange agreements with the local authorities such that:				
265.37(a)(1) as referenced by 262.34(d)(4)	a. The police, fire and emergency response teams are familiar with the layout of the site, the properties of the hazardous waste handled at the site, normal working areas, entrances to roads inside the facility and possible evacuation routes?				
265.37(a)(2) as referenced by 262.34(d)(4)	b. Where more than one police and fire department might respond to an emergency, the agreements specify a primary emergency authority?				
265.37(a)(3) as referenced by 262.34(d)(4)	c. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? And				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
265.37(a)(4) as referenced by 262.34(d)(4)	d. The local hospital is familiar with the properties of the hazardous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or releases?				
262.34(d)(5)(i)	11. Is there at least one employee either on the premises or on call at all times with the responsibility for coordinating all emergency response measures, i.e., emergency coordinator? NAME: _____ TITLE: _____				
262.34 (d)(5)(ii)	12. Is the following posted next to the facility telephone:				
262.34 (d)(5)(ii)(A)	a. The name and telephone number of the emergency coordinator?				
262.34 (d)(5)(ii)(B)	b. The location of fire extinguishers and spill control material; and if present, the location of the fire alarm? And				
262.34 (d)(5)(ii)(C)	c. The telephone number of the fire department (if no direct fire alarm)?				
262.20(a), 262.20(e)	13. Does the small quantity generator use a manifest to ship wastes off-site? If NO, go to question # 18. If YES, continue.				
262.12(c)	14. Has the generator determined that the facility has an EPA ID number? (NOTE: Shipments to POTWs must be manifested, if transported by a vehicle and the POTW must meet all permit-by-rule requirements of 9 VAC 20-60-1040.)				
9VAC 20-60-450	15. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit?				
262.20 and 262 Appendix	16. Is the following information on the manifest:				
	a. The generator's name, mailing address, EPA ID number, and telephone number?				
	b. A unique five digit number assigned to this manifest by the generator?				
	c. The total number of pages of the manifest?				
	d. The company name and EPA ID number of each transporter used?				
	e. The company name, site address, and EPA ID number of the facility designated to receive the waste?				
	f. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID number(UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?				
	g. The quantities of waste being shipped? And				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	h. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."				
262.42(b)	17. Exception reporting: If the generator (SQG) has not received a copy of a manifest signed by facility within 60 days of initial transporter, did s/he submit a legible copy of manifest with an indication of not receiving a confirmation of delivery, to the Director?				
262.20(a), 262.20(e)(1)	18. Does the small quantity generator have his wastes reclaimed under a contract, and use only a shipping paper? If YES,				
262.20(e)(1)(i)	a. Are the type of waste and frequency of reclamation shipments specified in the agreement?				
262.20 (e)(1)(ii)	b. Is the vehicle used to transport the waste to the recycling facility and to deliver material back to the generator owned and operated by the reclaimer? And				
262.20 (e)(2)	c. Does the small quantity generator maintain a copy of the agreement in his files for at least three years after termination or expiration of the agreement?				
262.40(a) and (c) as referenced by 262.44(a)	19. Does the generator retain copies of all manifests, test results and waste analyses for at least three years?				
262.34 (d)(5)(iii)	20. Does the generator ensure all employees are thoroughly familiar with proper waste handling and emergency procedures?				
	21. Has the generator ever submitted a release report if responsible for release of Hazardous Substance which threatens public health? (Must notify NRC, Local Government, the Department.)				
	22. Complete **4. Containers Checklist** for use and management of hazardous waste in containers.				
262.34(a)(2)as referenced by 262.34(d)(4)	23. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container?				
262.34(a)(3) as referenced by 262.34(d)(4)	24. Is the container labeled or marked clearly with the words "Hazardous Waste"?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
262.34(c)(1)	25. Does the generator have satellite accumulation areas where up to 55 gal of any one type of Hazardous Waste (HW) (1 qt acutely HW) are accumulated? If yes,				
262.34 (c)(1)(ii)	a. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?				
262.34(c)(2)	26. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,				
	a. Has the generator marked the excess amount with the date the excess amount began accumulating? And				
	b. Has the generator either removed the excess amount within three days of the date of excess accumulation or has he complied with all other provisions for accumulation areas. Namely, has he notified the Executive Director about the location of the accumulation area?				
	27. If the SQG accumulates hazardous waste in TANKS, complete **18. Tank Checklist.**				
	LAND DISPOSAL RESTRICTIONS				
PART 268	28. Does the facility generate, transport, treat, store or dispose any land-restricted wastes?				
268.7(a)(1) 268.7(a)(2)	29. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied the initial shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?				
268.7(a)(2) Table 268.7(a)(4)	30. Did the notification include the following information:				
	a. EPA Hazardous Waste Number?				
	b. The corresponding treatment standards?				
	c. The manifest number associated with the shipment of waste? And				
	d. Waste analysis data, when available?				
268.1(c)	31. Is land disposal of wastes occurring? If Yes,				
268.1(c)(1)	a. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? OR				
268.1(c)(2)	b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR				
268.1(c)(3)	c. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?				

40 CFR CITATION		REGULATION	YES	NO	NA	NC
268.1(e)(1)	32.	Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste per month? If so, the wastes are not subject to any provision of Part 268.				
268.5	33.	Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?				
268.7(a)(5)	34.	Is the SQG treating waste in Tanks or Containers in order to meet applicable treatment standards under 268.40?				
268.7(a)(5)		a. If Yes, has the SQG developed a Waste Analysis Plan?				
268.6(a)	35.	Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?				
268.3(a)	36.	Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?				
268.4(a)	37.	Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)				
	38.	If Yes, complete **12. Surface Impoundment Checklist.**				
268.7(a)(3)	39.	For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of 268.39 and 268.40?				
268.7(a)(3)(i) Table 268.7(a)(4)	40.	Did the notification include the following information:				
		a. EPA Hazardous Waste Number?				
		b. The corresponding treatment standards and all applicable prohibitions?				
		c. The manifest number associated with the shipment of waste? And				
		d. Waste analysis date, where available?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
268.7 (a)(3)(i)	41. Was the certification signed by an authorized representative, and did it state the following: I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR part 268 subpart D. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.				
268.7(a)(4)	42. Have restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?				
268.7(a)(8)	43. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis date, and other documentation for at least three years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?				
268.50	44. Is the generator storing land restricted waste? For one year storage only)				
268.50(a)(1)	45. If Yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?				

COMMENTS:

6. GROUND-WATER MONITORING CHECKLIST

40 CFR CITATION	REGULATION	YES	NO	NA	NC
PARTS 264/5 SUBPART F	**SECTION A – MONITORING SYSTEM**				
265.90	1. Does the facility have a ground-water monitoring system in operation?				
265.91	a. If yes, does the system consist of:				
PART 265	1. Minimally one upgradient monitoring well?				
PART 265	2. Minimally three downgradient monitoring wells?				
265.91	b. Are monitoring wells cased so that the integrity of the boreholes is maintained?				
264.92	c. Is a compliance monitoring system installed whenever hazardous waste constituents are detected at the compliance point ?				
264.100(c)	d. Is a corrective-action program initiated whenever the ground-water protection standard is exceeded?				
264.98	e. Is a detection monitoring program instituted in all other cases?				
PART 264	2. Does the facility have a monitoring and response program?				
264.99	a. If yes, is a compliance monitoring system instituted whenever hazardous constituents are detected at the compliance point?				
264.99	b. Whenever the ground-water protection standard is exceeded, does facility institute a corrective-action program?				
	c. In all other cases, does the facility institute a detection monitoring program?				
	SECTION B - SAMPLING AND ANALYSIS				
265.92(a)	3. Does the facility obtain and analyze samples from the ground-water monitoring system?				
265.92(a)	4. Has facility developed and followed a ground-water sampling and analysis plan?				
265.92(a)	a. If yes, does this plan include procedures and techniques for:				
	1. Sample collection?				
	2. Sample preservation?				
	3. Analytical Procedures?				
	4. Chain-of-custody control?				
265.92(b)	b. Does the facility determine the concentration or value of the following parameters in ground-water samples?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	1. Parameters characterizing the suitability of the ground water as a drinking water supply, as specified in Part 265, Appendix 3?				
	2. Parameters establishing ground-water quality (chloride, iron, manganese, phenols, sodium, sulfate)?				
	3. Parameters used as indicators of ground-water contamination (pH, specific conductance, total organic carbon, total organic halogen)?				
265.92)(c)	c. Has the owner/operator established initial background concentrations or values of all parameters specified above at least on a quarterly basis?				
265.92(c)	d. Has owner/operator obtained at least four replicate measurements for each sample, and has he determined the initial background arithmetic mean and variance?				
265.92(d)	e. After the first year, does owner/operator sample and analyze with the following frequencies:				
	1. Samples collected to establish background water quality (from above) at least annually?				
	2. Samples collected to indicate contamination (from above) at least semi-annually?				
	3. Elevation of ground-water surface at each monitoring well at each sampling event?				
265.93	**SECTION C - PREPARATION, EVALUATION, AND RESPONSE**				
265.93(a)	5. Did owner/operator prepare an outline of a ground-water quality assessment program?				
265.93(a)	a. If yes, did program determine the following:				
	1. Whether hazardous waste or hazardous waste constituents have entered the ground water?				
	2. Rate and extent of hazardous waste or hazardous waste constituent migration in groundwater?				
	3. Concentrations of hazardous waste or hazardous waste constituents in ground water?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
265.93(b)	b. For each well, has owner/operator calculated the arithmetic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean?				
265.93(c)	c. Has owner/operator submitted information documenting any significant increase in comparisons for upgradient wells (or decrease in pH)?				
265.93(c)	d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional ground-water samples from those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error.)				
	1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify the Regional Administrator within 7 days?				
265.93(d)	2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Regional Administrator within 15 days after notification (discussed above) a certified ground-water quality assessment program?				
	If yes, does plan include the following:				
	a. Number, location, and depth of wells?				
	b. Sampling and analytical methods for those hazardous wastes and hazardous waste constituents at the facility?				
	c.. Evaluation procedures, including any use of previously gathered ground-water quality information?				
	d. Schedule of implementation?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
265.93(d)(4)	3. Did owner/operator implement the ground-water quality-assessment program and, at a minimum, did he determine the following:				
	a. Rate and extent or migration of the hazardous waste constituents in the ground water?				
	b. Concentrations of the hazardous waste in the ground water?				
265.93(d)(5)	4. Did owner/operator submit a report to the Regional Administrator containing the requests of the assessment outlined in No. 3 above within 15 days?				
265.93(d)(6)	5. Did owner/operator notify the Regional Administrator of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the ground water?				
265.93(d)(7)	6. If owner/operator determined that hazardous waste or hazardous waste constituents entered the ground water, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or ground-water quality-assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if ground-water quality-assessment plan was implemented during post-closure?				
265.93(e)	7. If any ground-water quality-assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed the program and reported to the Regional Administrator, as outlined in No. 4 above?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
265.93(f)	8. If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on ground-water elevation obtained under No. 2e in Section B above to determine whether the requirements for location monitoring wells are satisfied?				
	a. If evaluation shows that the requirements for monitoring wells are not satisfied, has owner/operator modified the number location, or depth of the monitoring wells to bring the system into compliance?				
265.94	**SECTION D – RECORDKEEPING AND REPORTING**				
265.94(a)	6. Unless owner/operator is monitoring to satisfy the requirements of §265.93(d)(4), does owner/operator:				
265.92(c) / (d) 265.92(e) 265.93(b)	a. Keep records of the analyses, the ground-water surface elevations required throughout the active life of the facility and throughout post-closure?				
265.94(a)(2)	b. Report the following information to the Regional Administrator:				
	1. Within 15 days of analysis for each quarterly sampling event, does owner/operator submit results of background concentrations?				
	2. Does owner/operator inform the Regional Administrator about any parameters that exceed maximum contaminant levels listed in Appendix III?				
	3. (Annually) Does owner/operator report concentrations or values of parameters listed in §265.92(b)(3) for each well, including required evaluations for these parameters under §265.93(b)?				
	a. Does owner/operator also identify differences from initial background concentrations found in the upgradient wells no later than March 1 following each calendar year?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
265.93(f) 265.94(a)(2)	7. Does owner/operator submit results of the ground-water surface elevations, along with a description of the response, if needed?				
265.94(b)	8. If ground water is monitored to satisfy requirements of §265.93(d)(4), did owner/operator do the following:				
	a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure?				
	b. (Annually, until final closure) Submit to the Regional Administrator a report containing the results of the ground-water quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1 following each calendar year?				
	SECTION E - GENERAL REQUIREMENTS				
264.97	9. Does facility comply with the following requirements?				
	a. Are sufficient wells installed at appropriate locations and depths?				
	b. Have sampling and analysis techniques been consistent?				
	c. Have ground-water elevation data been recorded?				
	d. Have background concentrations been determined?				
	10. If ground water is monitored to satisfy requirements of §265.93(d) (4), owner/operator must:				
	a. Keep records of the analyses and evaluations specified in the plan throughout the facility's active life, and, for disposal facilities, throughout post-closure.				
	b. Report the following ground-water monitoring information:				
	1. During the first year when initial background concentrations are being determined, did owner/operator submit values within 15 days after completing analysis?				
	2. If yes, did owner/operator also submit an identification of any parameters whose concentrations exceed maximum levels in Appendix III?				
	11. (Annually) Did owner/operator report concentrations or values of the parameters listed in §265.93(b)(2) for each well, along with required evaluations for these parameters under §265.93(b)?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	12. Did owner/operator also separately identify any significant differences from initial background concentrations for upgradient wells?				
	13. Did owner/operator report on the results of ground-water surface elevations (and a description of the results if necessary) by March 1 of the following year?				
264.98	**SECTION F - DETECTION MONITORING PROGRAM**				
	14. Has owner/operator established detection monitoring system to provide reliable indications for detection releases?				
	a. If yes, are the following components included in the system:				
	1. Background values?				
	2. Determination of ground-water flow rate?				
	3. Determination of ground-water compliance point semiannually?				
	4. Determination of statistically significant increases over background concentrations?				
	5. Notification to the Regional Administrator if there was a statistically significant increase?				
264.99	**SECTION G - COMPLIANCE MONITORING PROGRAM**				
	15. Does facility operate a compliance monitoring program?				
	a. Does facility determine concentrations of hazardous constituents at least quarterly?				
264.99(e)	b. Does facility determine ground-water flow rate and direction in uppermost aquifer annually?				
264.99(g)	c. Does facility analyze samples for Appendix IX constituents annually?				
264.99(h)	d. Does facility make statistically significant increases over background values?				
264.99(h)	e. If there is an increase, does facility notify the Regional Administrator and establish a corrective-action program?				
264.100	**SECTION H - CORRECTIVE -ACTION PROGRAM**				
	16. Does facility follow a corrective-action program that meets the facility's permit requirements?				

COMMENTS:

7. HEALTH & SAFETY CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/265.16(a)(1)	**SECTION A - OUTLINE OF PERSONNEL TRAINING PROGRAM**				
	1. Does the facility have a written training program?				
264/5.16(c) and (d)(3)	2. Does the program consist of:				
	a. strictly classroom instruction?				
	b. strictly on-the-job training?				
	c. classroom instruction AND on-the-job training?				
	3. Is an annual refresher course required for personnel whose positions at the facility are related to hazardous waste management?				
264/265.16 (d)(1) and (2)	**SECTION B - JOB TITLE/JOB DESCRIPTION**				
	4. Is a job title provided for each employee whose position at the facility is related to hazardous waste management?				
	5. Is a job description provided for each employee whose position at the facility is related to hazardous waste management?				
264/265.16(a)(2)	**SECTION C - TRAINING DIRECTOR**				
	6. Is the training program directed by a person trained in hazardous waste management?				
264/265.16(a)(2)	**SECTION D - RELEVANCE OF TRAINING TO JOB POSITION**				
	7. Are facility personnel instructed in hazardous waste management procedures (including contingency plan implementation) relevant to their positions?				
264/265.16(a)(3)	**SECTION E - TRAINING AND EMERGENCY RESPONSE**				
	8. Does the training program include the following emergency response procedures **where applicable**?				
	a. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment?				
	b. Key parameters for automatic waste feed cut-off systems?				
	c. Procedures for utilizing communications or alarm systems?				
	d. Directions for responding to fires or explosions?				
	e. Procedures for groundwater contamination response?				
	f. Procedures for conducting shutdown operations?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/265.16(b), (d)(4) and (3)	**SECTION F - IMPLEMENTATION OF TRAINING PROGRAM**				
	9. Are all facility personnel trained within six months of their employment or assignment to the facility or transfer to a new position?				
	10. Are facility personnel allowed to work unsupervised before their training program has been completed?				
	11. Are records maintained which document that the required training has been given to and completed by facility personnel?				
264/265.33	**SECTION G - TESTING AND MAINTENANCE OF EQUIPMENT**				
	12. Does the owner/operator test and maintain (as necessary to assure its proper operation in time of emergency) the following equipment:				
	a. All communications or alarm systems?				
	b. Fire protection equipment?				
	c. Spill control equipment?				
	d. Decontamination equipment?				
264/265.15	**SECTION H - GENERAL INSPECTION REQUIREMENTS (PERMITTED FACILITIES ONLY)**				
	13. Does the owner/operator maintain a written schedule at the facility for the inspection of:				
	a. Monitoring equipment?				
	b. Safety and emergency equipment?				
	c. Security devices?				
	d. Operating and structural equipment?				
	e. Types of problems with equipment:				
	1. Malfunction				
	2. Operator error				
	3. Discharges				
	14. Does the schedule identify the types of problems to look for?				
	15. Is the frequency of inspection based on the possible deterioration of equipment and the probability of incident?				
	16. Are areas subject to spills, such as loading and unloading areas, inspected daily?				
	17. Does the owner/operator maintain an inspection log? If yes, does the log include:				
	a. Date and time of inspection?				
	b. Name of inspector?				
	c. Notations of observations?				
	d. Date and nature of repairs or remedial actions?				
	18. Have any malfunctions or other problems not been remedied? (Summarize in comments section.)				
264/265.35	**SECTION I - REQUIRED AISLE SPACE**				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	19. Does the facility maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?				
	20. If aisle space is not maintained, has the owner/operator demonstrated to the Regional Administrator that the space is not needed?				
264/265.32	**SECTION J - EQUIPMENT REQUIREMENTS**				
	21. Is there evidence of fire, explosion, or contamination of the environment? If yes, explain in the comment section.				
	22. Is the facility equipped with the following:				
	a. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel?				
	b. A device such as a telephone (immediately available) or handheld two-way radio capable of summoning emergency assistance from police, fire, or state or local emergency response teams?				
	c. Portable fire extinguishers?				
	d. Fire control equipment (including special extinguishing equipment such as foam, inert gas, or dry chemical)?				
	e. Spill control equipment?				
	f. Decontamination equipment?				
	g. Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?				
264/265.17(a) and (b)	**SECTION K - REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES**				
	23. Does the facility handle ignitable or reactive waste? If yes:				
	a. Does the owner/operator take the following precautions to prevent accidental ignition or reaction of wastes: Separate and protect ignitable or reactive wastes from sources of ignition or reaction (open flames, smoking, cutting, welding, hot surfaces, frictional heat, static electrical or mechanical sparks, spontaneous ignition, and radiant heat?				
	24. Does the owner/operator confine smoking and open flames to specially designated locations, while ignitable or reactive waste is being handled?				
	25. Are "No Smoking" signs placed conspicuously wherever there is a hazard from ignitable or reactive waste?				
	26. Does the owner/operator have procedures in place to prevent accidental ignition or reaction of wastes?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/265.50 through §265.56	**SECTION L - CONTINGENCY PLAN**				
	27. Does the owner/operator have a Contingency Plan, or a Spill Prevention Control and Counter measures (SPCC) Plan, or some other emergency plan, that is amended for hazardous waste management?				
	28. Is a copy maintained at the facility?				
	29. Has a copy been submitted to all local police and fire departments, hospitals, and State and local emergency response teams?				
	30. Does the plan describe the control procedures taken in the event of a fire, explosion, or release?				
	31. Does the plan describe how and when it will be implemented?				
	32. Does the plan describe arrangements agreed to by local police and fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?				
	33. Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?				
	34. Is one person named as the primary coordinator?				
	35. Does the coordinator have the authority to commit the resources to carry out the emergency plan?				
	36. Does the plan physically describe and identify the location of all emergency equipment at the facility?				
	37. Does the plan include provisions to ensure that the equipment is cleaned and fit for its intended use before operations are resumed?				
	38. Does the plan include an evacuation plan for facility personnel?				
	39. Does the plan describe:				
	a. Signal(s) to be used to begin evacuation?				
	b. Evacuation routes?				
	c. Does the plan describe the methodology for immediate notification of:				
	1. Facility personnel?				
	2. State or local agencies with designated response roles?				
	40. Does the plan include procedures for identification of released materials?				
	41. Does the plan include procedures/criteria to assess possible hazards to human health and the environment that may result from the release, fire, or explosion?				
	42. Does the plan describe all reasonable measures necessary to ensure that fires, explosions, or releases do not occur, reoccur, or spread to other hazardous waste at the facility?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	43. Does the plan describe procedures to monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment if the facility stops operation in response to a fire, explosion, or release?				
264/265.37	**SECTION M - NECESSARY AGREEMENTS WITH LOCAL AUTHORITIES**				
	44. Has the owner/operator made the following arrangements:				
	a. Familiarized police, fire departments, and emergency response teams with the layout of the facility and associated hazards?				
	b. Designated one police and fire department with primary emergency authority when more than one might respond?				
	c. Agreements with State emergency response teams, contracts, and equipment supplies?				
	d. Familiarized local hospitals with the properties of waste handled at the facility and the types of injuries or illness that could result?				
	45. Where authorities decline to enter into such arrangements, has the owner/operator documented the refusal?				

COMMENTS:

7.A. INCINERATOR HEALTH & SAFETY CHECKLIST

40 CFR CITATION		REGULATION	YES	NO	NA	NC
SUBPART O – INCINERATOR 264/265.347(b)	**MONITORING AND INSPECTIONS**					
	1.	Is the complete incinerator and associated equipment (pumps, valves, etc.) inspected daily for leaks, spills, and fugitive emissions?				
264.347(c)	2.	Are emergency waste cut-off systems and associated alarms tested weekly? (Not applicable to interim status facilities.)				
§264.345(d)	3.	Is the incinerator combustion zone sealed? (Not applicable to interim status facilities)				
	4.	If this is a rotary kiln incinerator, is there black smoke or evidence of emissions?				
	5.	Is the combustion zone pressure lower than atmospheric pressure? If no, what is the reading? (Explain in comment section.)				
	6.	If the pressure is not measured in the combustion zone, what alternative methods are used equivalent to maintenance of combustion zone pressure? (Explain in comment section.)				
264.345(e)	**OPERATING REQUIREMENTS (NOT APPLICABLE TO INTERIM STATUS FACILITIES)**					
	7.	Determine whether there is a functioning system to automatically cut off waste feed to the incinerator when operating conditions deviate from the permitted levels? (Optional: Facilities can simulate operating conditions to trigger the shut-off ...inspector should observe actual shut-off)				
PART 264/265	**UNPLANNED INCINERATOR STACK EMISSIONS**					
	8.	How many times did the emergency bypass stack open during the past 6 months of operation?	___ Times			
	9.	How long did it last each time in average?	___ Minutes			
	10.	How many times was the automatic waste feed cut-off system activated during the past 30 days of operation?	___ Times			
	11.	Due to CO excursion?	___ Times			
	12.	Due to Temperature excursions?	___ Times			
	13.	Due to Waste feed excursions?	___ Times			
	14.	Other causes?	___ Times			

COMPARISON OF PERMIT AND OPERATING CONDITIONS

Date
Time Readings Began
Time Readings Ended

SECTION A – PERMIT OPERATING PARAMETERS

1. Temperature measured at each combustion chamber exit

	PERMITTED MAXIMUM (UNITS)	PERMITTED MINIMUM (UNITS)	OBSERVED READING(S) (UNITS)	CALCULATED VALUE
a. PRIMARY				NA
b.				NA
c. SECONDARY				NA
WITHOUT FLAME				
WITH FLAME				

2. CO emissions measured at the stack or other appropriate location: _____

	PERMITTED MAXIMUM (UNITS)	PERMITTED MINIMUM (UNITS)	OBSERVED READING(S) (UNITS)	CALCULATED VALUE
a.				
b.				
c.				

		YES	NO
a.	Does CO monitor automatically correct all readings to 7% O2 based on actual O2 stack concentration?		
b.	Does permit require O2 correction?		
c.	Does permit specify the correction factor to be used? If so, list it:		
d.	Date correction factor last determined:		
e.	Describe any changes made in O2 correction factor:		
f.	Permit-specified frequency for verifying O2 correction factor:		
g.	If a 60-minute rolling average is required, does the observed reading reflect a 60-minute rolling average?		

h.	Applicable?		
i.	If no, attach data and calculate the average		

3. Total Hydrocarbons as methane:

4. O2 emissions (location):

5. Flue gas flow rate or velocity measured at stack

Permit Operating Parameters Permitted
Maximum
(units) Permitted
Minimum
(units) Observed
Reading(s)
(units)
Calculated
Value

5. Feed rate of each waste stream to each combustion chamber.

Containerized waste feeds covered under item 10? Yes No

Chamber Waste Stream
(Name or identifier)

a.

b.
c.
d.
e.
f.

6. Pressure in primary chamber:

7. Air pollution control:

a. ratio of the steam flow to the hydrosonic scrubber (pounds/hr) to stack gas flow rate (ACFM)

NA

b. pH of liquid to the packed tower

c. pH of liquid to hydrosonic scrubber

d. conductivity of the scrubber liquor blow down

e. liquid flowrate to the packed tower

f. liquid flowrate to the hydrosonic scrubber

g. inlet temperature to the packed tower

(Checklist No. 1 - Cont'd)

Permit Operating Parameters Permitted
Maximum
(units) Permitted
Minimum
(units) Observed
Reading(s)
(units)
Calculated
Value

10. Additional permit conditions
Monitor the following process parameters in addition to those previously mentioned:

a. quench water flow

b. flue gas flow rate

c. oxygen flow rate

Checklist No. 2 -- Visual Assessment and Audit Activities
for an "In-Depth" Inspection

A. Observation of Equipment/Function [1. etc. = Problem note (see below)]

Leaks/
Emissions
Seals Structural
Integrity Proper
Function Safe
Issue

-- Waste unloading

-- Waste storage/blending
-- Waste handling/piping
-- Waste feed/fuel systems
-- Combustion chambers/burners

-- Kiln drive system
-- Combustion air fans
-- Pollution control devices
    • Packed Tower Absorber

    • Hydrosonic Scrubber
-- Emergency vent stack
    (dump stack)
-- Process instrumentation
-- Ash handling system
-- Scrubber effluent handling
--

Notes

1.

(Checklist No. 2 - Cont'd)

B. Observed Operations [Give brief description of problem, or reference a Note below (1,2, etc.)]

Status/Comments

-- Records of permit parameters (complete, accessible)

-- Proper identification of date, time, and units on strip charts

-- Records of waste acceptance

- handling
- characterization

-- Log of inspections

- calibrations
- maintenance

-- Subjective evaluation of operators

-- Staff knowledge of emergency procedures

contingencies

-- Handling/fate of residuals

- Primary chamber ash
- Scrubber effluent (_____)
- Scrubber effluent (_____)
-
-

-- Appearance of stack emissions

--

--

--

Notes

1.

(Checklist No. 2 - Cont'd)

C. General Quality of Operation

Comments

-- Odors

-- Housekeeping

- Storage areas

- Waste feed areas

- Control room

- General facility

- Laboratory

--

--

--

(Checklist No. 2 - Cont'd)

2. Observe the operation of the automatic waste feed cutoff system in response to simulated upset conditions for each automatic cutoff condition required in the permit [Note: At least one test must involve an actual shutdown. *S = Simulated, A = Actual]

Automatic Cutoff Conditions	Permit Limits Value	Time Lag	Observed Value	Time Lag	Adequate S or A*	Function?
• Minimum temperature						
Chamber (kiln)						
Chamber (kiln)						
Chamber (2nd)						
• Maximum CO						

- Other CO limit

- Maximum flue gas flow rate/velocity

- Maximum feed rate
  (stream)

- Pressure in primary combustion chamber

- Air pollution control:
  quench water

none

Comb Eff

Stack O2

Loss of Fan

Loss of Power

(Checklist No. 2 - Cont'd)

3. Review documentation of the most recent calibration of the monitoring instrumentation for all permit operating parameters specified in the permit. Discuss procedures used with the facility staff. (Provide notes for each parameter -- attach note pages as applicable.)

System	Frequency of Calibration	Date of Last Calibration	Stat
• Temperature			
Kiln			
Secondary Chamber			

Packed Tower

- Flow rates

Oxygen

Packed Tower Water

Hydrosonic Scrubber Water

Water Flow to Quench System

Flue Gas Flowrate

Waste Feed Rate

Steam Feed Rate

- Steam Drum Water Level

• Packed Tower pH

• Hydrosonic Scrubber pH

(Checklist No. 2 - Cont'd)

B. Audits of Waste Characterization and Handling [1, etc. = Problem note (see below)]

Status

1. Review of Waste Characterization

a. Analysis of appropriate parameters

b. Frequency of analysis

c. Adequate analysis documentation (subjective)

2. Review of Waste Handling Documentation

a. Waste acceptance
-- Manifest/Logs

-- "Fingerprint" analysis

b. Blending/feeding logs

3. Review of on-site laboratory (optional)

a. Calibration records

b. Maintenance records

c. Availability of Analytical and QA/QC Procedures

C. Review of Other Records Required by the Permit

1. Records of Dump Stack Openings

- Openings documented: _____ incidents since _____ (date of last inspection) or _____ in last 12 months reported to _____ state or _____ EPA
- Temperature maintained during openings

- Minimum airflow maintained during openings
- Causes

- Corrective actions

2. Records of Automatic Waste Feed Cutoff (AWFCO)

- Documented

- Frequency of cutoff incidents (_____ per month or _____ per day (average of _____ days))
- Major causes for AWFCO

(Checklist No. 2 - Cont'd)

3. Inspection Logs/Calibration Records

- Complete
- Adequate schedule
- Recurring problems

4. Maintenance Records

- Timely corrective action
- Complete
- Routine maintenance performed on schedule
- Frequency?
- Note any recurring maintenance problems

- List any equipment replaced since last inspection (obtain manufacturer's specifications)

D. Audit of Waste Analysis (optional)

- Provide check samples for analysis by the facility lab or obtain sample splits for return to agency labs (or agency contractor lab)
- Document the origin of each sample
- Identify the parameters for analysis, analysis methods, sampling handling/storage limitations, and any essential QA/QC requirements to be completed by the facility's lab and the agency lab (if applicable)

Notes:

Checklist No. 2 - Incinerator Specific Checklist (Optional)
to Curb Fugitive Emissions

The following checklist (optional) contains the protocol to assess the procedures and devices used to control fugitive emissions from the material handling aspects of incineration facilities. Recognizing the fact that the majority of fugitive air emissions from a hazardous waste incineration facility emanate from the material handling phase of its operation, and that a RCRA incinerator permit traditionally did not address the subject, it is imperative that the facility take appropriate measures to alleviate the potential risk of injury to public health and the environment.

Regulatory Citation & Description	RCRA Checklist Item	Yes	No
	Waste Unloading/Transfer Operation		
§264.31 and §265.31	Is there a vent gas emission control device in place for loading/unloading liquid transport vehicles?		

If yes, describe

Is there a fugitive air emission control device, or procedures, in place for the following?

- Flex hose couplings/drip pans?

  If yes, describe:

- Cleaning/replacing liquid filters and strainers?

If yes, describe:

- Loading/unloading bulk solid wastes?

  Is there a vent gas emission control device for liquid waste storage tanks?

  If yes, describe:

Is there a fugitive air emission monitoring device in the loading/unloading areas?

If yes, describe:

Regulatory Citation & Description	RCRA Checklist Item	Yes	No

Size Reduction/Shredding Operation

Is there a fugitive air emission monitoring device in the following areas?

- Container repackaging area?
- Drum/container shredding area?

Is there a fugitive air emission control device, or procedures, in place for the following areas?

- Container repackaging area?

  If yes, describe:

- Drum/Container shredding area?

  If yes, describe:

Incinerator Feeding/Residue Removal

Is there a fugitive air emission control device, or procedures, in place for the following?

- Cleaning/replacing liquid strainers or filters?

  If yes, describe:

- Ash removal/accumulation area?

  If yes, describe:

- Scrubber blowdown/recycle tank?

  If yes, describe:

Regulatory Citation & Description	RCRA Checklist Item	Yes	No
§264.31 §265.31 §264.340			

Unplanned Incinerator Stack Emissions

- How many times did the emergency bypass stack open during the past 6 months of operation?

  How long did it last each time, on average?

- How many times was the automatic waste feed cut-off system activated during the past 30 days of operation?

  Due to CO excursion?

  Due to temperature excursion?

  Due to waste feed excursion?

  Other causes?

____Times

____Minutes

____Times

____Times

____Times

____Times

____Times

(Note: The opening of the emergency bypass stack and the activation of the automatic waste feed cut-off system, normally implies that the incinerator has failed to meet one or more of the performance standards identified in the Federal incinerator rule, 40 CFR Part 264, Subpart O. They may also imply that the incinerator has violated the operating limits provided in the RCRA permit, depending on how the operating condition was written in the permit.

If the permit was written to prohibit the Permittee from feeding waste into the incinerator when the operating conditions deviate from the permit limits, then the activation of automatic waste feed cut-off system would not imply violation of the permit conditions. On the other hand, if the permit was written to prohibit the facility from incinerating hazardous wastes, when the operating conditions deviate from the permit limits, then the Permittee has clearly violated the permit conditions, when the waste feed cut-off was activated.)

General Ambient Air Monitoring

- Does the facility monitor ambient air?

If yes, describe location, frequency, and monitoring parameters

Yes No

8. INCINERATOR CHECKLIST

NA = Not Applicable, NC = Non-Compliance

Provide description of incinerator system (a block diagram showing the types and arrangement or equipment is recommended).

SECTION A – PERMIT OPERATING PARAMETERS

1. **TEMPERATURE** (measured at each combustion chamber exit)

LOCATION	PERMITTED MAXIMUM	PERMITTED MINIMUM	OBSERVED READINGS

2. **CO EMISSIONS** (measured at the stack or other appropriate location)

LOCATION	PERMITTED MAXIMUM	PERMITTED MINIMUM	OBSERVED READINGS

a.	Does CO monitor automatically correct all readings to 7% O_2 based on actual O_2 stack concentration?	YES	NO	NA
b.	Does permit require O_2 correction?	YES	NO	NA
c.	Does permit specify the correction factor to be used? If so, list it:	YES	NO	NA
d.	Date correction factor last determined:	YES	NO	NA
e.	Permit-specified frequency for verifying O_2 correction factor:			
f.	If a 60 – minute rolling average is required, does the observed reading reflect a 60 – minute rolling average? Applicable? If no, attach data and calculate the average:	YES	NO	NA
g.	Total hydrocarbons as methane:	YES	NO	NA

3. O_2 EMISSIONS

4. FLUE GAS FLOW RATE OR VELOCITY (measured at stack):

5. FEED RATE OF EACH WASTESTREAM TO EACH COMBUSTION CHAMBER

WASTESTREAM	CHAMBER	PERMITTED MAXIMUM	PERMITTED MINIMUM	OBSERVED READINGS	CALCULATED VALUE

6. PRESSURE IN PRIMARY CHAMBER:

7. AIR POLLUTION CONTROL

PARAMETER	PERMITTED MAXIMUM	PERMITTED MINIMUM	OBSERVED READINGS	CALCULATED VALUE
Ratio of the steam flow to the hydrosonic scrubber (lbs/hr) to stack gas flow rate (ACFM)				
pH of liquid to the packed tower				
pH of liquid to hydrosonic scrubber				
Conductivity of the scrubber liquor blow down				
Liquid flow rate to the packed tower				
Liquid flowrate to the hydrosonic scrubber				
Inlet temperature to the packed tower				

8. ADDITIONAL PERMIT CONDITIONS

PARAMETER, unit	PERMITTED MAXIMUM	PERMITTED MINIMUM	OBSERVED READINGS	CALCULATED VALUE

SECTION B – VISUAL ASSESSMENT

1. OBSERVATION OF EQUIPMENT/FUNCTION

EQUIPMENT OR FUNCTION	LEAKS & EMISSIONS	SEALS	STRUCTURAL INTEGRITY	PROPER FUNCTION	SAFE ISSUE
Waste unloading					
Waste storage/blending					
Waste handling/piping					
Waste feed/fuel systems					
Combustion chambers/burners					
Kiln drive system					
Combustion air fans					
Pollution control devices					
Emergency vent stack					
Process instrumentation					
Ash handling system					
Scrubber effluent handling					

NOTES:

2. OBSERVED OPERATIONS

a.	Does the facility maintain records of permit parameters (complete and accessible)?	YES	NO	NA
b.	Does the proper identification of date, time, and units appear on strip charts?	YES	NO	NA
c.	Does the facility maintain records of waste acceptance, handling, and characterization?	YES	NO	NA
d.	Does the facility maintain a log of inspections, calibrations, and maintenance?	YES	NO	NA
e.	Does staff demonstrate knowledge of emergency procedures and contingencies?	YES	NO	NA

f. How does the facility handle the residuals from:

1. Primary chamber ash?
2. Scrubber effluent?
3. Other? Specify: _____

g. Describe the appearance of the stack emissions:

3. GENERAL QUALITY OF OPERATION

Provide a description of the following:

a. Odors

b. Housekeeping

1. Storage areas
2. Waste feed areas
3. Control room
4. General facility
5. Laboratory

c. Other _____

4. OPERATION OF AUTOMATIC WASTE FEED CUTOFF SYSTEM

Observe the operation of the automatic waste feed cutoff system in response to simulated upset conditions for each automatic cutoff condition required in the permit. [NOTE: At least one test must involve an actual shutdown. *S = Shutdown, A = Actual]

AUTOMATIC CUTOFF CONDITIONS	PERMIT LIMITS		OBSERVED		S or A*	Adequate Function?
	Value	Time Lag	Value	Time Lag		
Minimum temperature						
Chamber (kiln)						
Chamber (2nd)						
Maximum CO						
Other CO limit						
Maximum flue gas flow (rate/velocity)						
Maximum feed rate (stream)						
Pressure in primary combustion chamber						
Air pollution control:						
Quench water						
Comb Eff						
Stack O_2						
Loss of fan						
Loss of power						

NOTES:

5. CALIBRATION AND MONITORING INSTRUMENTATION

Review documentation of the most recent calibration of the monitoring instrumentation for all permit operating parameters specified in the permit. Discuss procedures sued with the facility staff.

SYSTEM	FREQUENCY OF CALIBRATION	DATE OF LAST CALIBRATION	STAT
Temperature			
Flow rates:			
Oxygen			
Packed tower water			
Hydrosonic scrubber water			
Water flow to quench system			
Flue gas flow rate			
Waste feed rate			
Steam feed rate			
Steam drum water level			
Packed tower pH			
Hydrosonic scrubber pH			

NOTES:

SECTION C – WASTE CHARACTERIZATION AND HANDLING

1. REVIEW OF WASTE CHARACTERIZATION

a.	Does the facility analyze for appropriate parameters?	YES	NO	NA
b.	What is the frequency of analysis?			

2. REVIEW OF WASTE HANDLING DOCUMENTATION

a.	Does the facility maintain waste acceptance logs, fingerprint analysis and manifests?	YES	NO	NA
b.	Does the facility maintain blending/feeding logs?	YES	NO	NA

3. REVIEW OF ON-SITE LABORATORY (OPTIONAL)

a.	Does the facility maintain calibration records?	YES	NO	NA
b.	Does the facility maintain maintenance records?	YES	NO	NA
c.	Availability of analytical and QA/QC procedures?	YES	NO	NA

SECTION D – REVIEW OF OTHER RECORDS REQUIRED BY THE PERMIT

1. RECORDS OF DUMP STACK OPENINGS

a.	Are the openings documented?	YES	NO	NA
b.	Provide number of incidents and date of last inspection			
c.	Were the openings reported to the state or EPA?	YES	NO	NA
d.	Was the temperature maintained during the openings?	YES	NO	NA
e.	Was the minimum air flow maintained during the openings?	YES	NO	NA
f.	What were the causes?			
g.	Were corrective actions taken?	YES	NO	NA

2. RECORDS OF AUTOMATIC WASTE FEED CUTOFF (AWFCO)

a.	Did the facility document AWFCO incidents?	YES	NO	NA
b.	What is the frequency of AWFCO incidents?			
c.	Were the incidents reported to the state or EPA?	YES	NO	NA
d.	What were the causes?			
e.	Were corrective actions taken?	YES	NO	NA

3. MAINTENANCE RECORDS

a.	Does the facility perform timely corrective actions?	YES	NO	NA
b.	Are the corrective actions complete?	YES	NO	NA
c.	Is routine maintenance performed on schedule?	YES	NO	NA
d.	Note any recurring problems.			
e.	List any equipment replaced since last inspection (obtain manufacturer's specifications).			

NOTES:

9.B. LAND DISPOSAL RESTRICTIONS CHECKLIST TSD REQUIREMENTS

40 CFR CITATION	REGULATION	YES	NO	NA	NC
268.7(b) 264.13 265.13	**SECTION A – WASTE ANALYSIS**				
264/5.13(b)(6)	1. Does the waste analysis plan address the following LDR waste categories:				
	a. F001-F005 Spent Solvents?				
	b. F020-F023 and F026-F028 Dioxins?				
	c. California List Wastes?				
	d. First, Second, and Third Third Wastes				
	e. Phase One Wastes				
	2. Has the waste analysis plan been revised to address F039 multi-source leachate?				
	3. What date was the waste analysis plan last revised? ___/___/___				
264/5.13(a)(1)	4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes?				
	a. If yes, which of the following are sources of analytical data? (More than one may apply.): ___ Generator provides data ___ Facility performs analyses in on-site laboratory ___ Facility contracts analyses at off-site laboratory				
264/5.13(a)(2)	b. If the generator provides data, does the facility provide corroborative testing?				
	c. If analyses are conducted off site, identify lab:				
268.7(b)(1)	d. Are wastes with treatment standards specified in §268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)? (BDAT = stabilization/immobilization technology) See Section 268.40(a) for options for using TCLP or EP test methods. See Appendix A.				
264/5.73 (b)(3)	If yes, list the wastes for which TCLP was used and provide the date of last test, identify frequency of testing, and note any problems. Attach test results.				
268.7(b)(3)	e. Are wastes with treatment standards specified in §268.43 analyzed using total constituent analysis? (BDAT = destruction/removal technology) See Appendix C for exceptions.				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.73 (b)(3)	If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results.				
268.32(i)	f. Is the paint filter liquids test (PFLT) used to determine if California List wastes are liquid hazardous waste?				
264/5.73(b)(3)	If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.				
264/5.73	**SECTION B – OPERATING RECORD**				
264/5.73(b)(3)	5. Does the operating record contain records and results of waste analyses performed as specified in §§268.4 and/or 268.7(b)?				
264/5.73(b) (11), (13), and (15)	6. Does the operating record contain copies of LDR notifications and certifications? Include both those received from generators, and those prepared for off-site shipments.				
264/5.73(b) (12), (14)	7. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site?				
	8. Does the documentation discussed in points 6 and 7 reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision? NOTE: The soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.				
268.50	**SECTION C – STORAGE**				
	8. Are prohibited wastes stored on site in Containers? (If No, go to 2.) NOTE: See Appendix C for distinction between restricted and prohibited wastes.				
268.50(a)(2)(i)	Are all containers clearly marked to identify the contents and date(s) entering storage?				
	Have wastes been stored for more than one year since the applicable LDR regulations went into effect? (If No, go to 2.)				
268.50 (c)	Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? If yes, state how:				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	9. Are prohibited wastes stored on site in tanks? (If No, go to 3.)				
268.50 (a)(2)(ii)	Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record?				
	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect? (If Yes, go to 3.)				
268.50(c)	Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?				
	10. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm? (If No, go to D.)				
268.50(f)	Does the facility meet the TSCA criteria in 40 CFR 761.65(b)?				
268.50(f)	Have these wastes been stored for more than one year?				
	SECTION D – TREATMENT				
	11. Does the facility treat restricted wastes other than in surface impoundments? (If No, do not complete this section. Go to E.)				
268.40(b)	12. Are required technologies used to treat wastes which have treatment standards specified in §268.42? (If Yes or NA, go to 3.)				
	a. Was an alternative method approved?				
268.42(b)	List each waste code, the technology specified in §268.42, and the alternative method. Check if approval of the alternative method is documented. Waste Code Required Technology Alternative Method Approval				
268.42(c)(4)	13. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the Subpart D treatment standards for these characteristic wastes?				
	14. Describe all other waste codes and treatment processes: Waste Code Treatment Processes				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	15. Characteristic wastes: Is the Part 268 treatment standard lower than the Part 261 characteristic level? NOTE: This applies to both concentration based treatment standards specified in §§268.41 and 268.43, and to some §268.42 required methods which result in treatment below the characteristic level. See Appendix D.				
268.9(d)	If yes, does the facility manage the waste as restricted until Part 268 treatment standards are met, even after the waste is rendered non-hazardous?				
268.3	16. Dilution Prohibition:				
	a. Does the facility mix prohibited wastes with different treatment standards? (If No, go to c.)				
	List the wastes:				
55 FR 22666	b. Are the wastes amenable to the same type of treatment?				
	If yes, is this method used for the aggregated wastes?				
268.3(a)	c. Based on an assessment of points a and b, or any other relevant information, is dilution used as a substitute for treatment?				
268.7(b)	17. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes?				
	18. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?				
	Complete the following table: Waste Code — Receiving Facility				
268.9(d)(1) 268.7(b)(5)	a. Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State?				
	19. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?				
	Complete the following table: Waste Code — Receiving Facility				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
268.7(b)(4) 268.7(b)(5)	a. Are a notification and a certification provided to the land disposal facility with each waste shipment?				
	20. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?				
	Complete the following table: Waste Code Receiving Facility				
268.7(b)(6)	a. Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment?				
268.4	**SECTION E – SURFACE IMPOUNDMENTS**				
	21. Are restricted wastes placed in surface impoundments for treatment?				
	List the wastes:				
268.3(a) 268.4(b)	22. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?				
268.4(a)(4)	23. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements?				
268.4(a)(3)(ii)	24. If the minimum technology requirements have not been met, has a waiver been granted for that unit?				
268.4(a)(2)(i)	25. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.)				
264/5.73(b)(3)	26. Does the operating record adequately document the results of waste analyses performed in accordance with §268.4?				
	27. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels for the following:				
	a. Sludge List waste code:				
	b. Supernatant List waste code:				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	c. Provide the frequency of analyses conducted on treatment residues:				
268.4(a)(2)(ii)	28. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis?				
268.4(a)(2)(iii)	Are residues subsequently managed in another surface impoundment?				
268.4(a)(2)(ii)	29. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?				
	SECTION F – LAND DISPOSAL				
268.2(c)	30. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? *NOTE: Do not include surface impoundments addressed in E.				
	If yes, specify which units and what wastes each unit has received: Unit Waste				
268.7(c)(2)	31. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met?				
268.9(c)	32. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal? NOTE: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.				
264/5.73(b)(3)	33. Does the operating record adequately document the results of waste analyses performed in accordance with §268.7(c)? If yes, at what frequency are analyses performed?				
	34. Does the facility land dispose of restricted wastes which are not prohibited?				

40 CFR CITATION		REGULATION	YES	NO	NA	NC
		List waste codes in appropriate category below: National Capacity Variance (Part 268, Subpart C) Case-By-Case Extension (§268.5) No-Migration Petition (§268.6) Treatment Standard Variance (§268.44)				
264/5.73 (b)(10)	35.	Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification (§268.7(a)(3)) for each shipment of restricted waste subject to a case-by case extension or no-migration petition?				
	36.	Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in §268.5(h)(2)?				
	37.	If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?				
	38.	Are restricted wastes placed in underground injection wells?				
		SECTION G – OTHER WASTE STREAMS				
	39.	Does the facility generate wastes other than residues from RCRA treatment units?				
	40.	On-Site Management				
55 FR 22662		a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)?				
268.9(d)		b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until Part 268 treatment standards are met? NOTE: This applies to both concentration based treatment standards specified in §§268.41 and 268.43, and to some §268.42 required methods which result in treatment below the characteristic level. See Appendix D.				
	41.	Off-Site Management: Waste Exceeds Treatment Standards				
		a. Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped. Waste Code Receiving Facility				
268.7	b. Are LDR notifications provided for each shipment to the treatment or storage facility?				
	c. If alternative treatment standards are specified for lab packs, is the certification required in §268.7(a)(8) or (9) included with the notification?				
	42. Off-Site Management: Wastes Meets Treatment Standards				
	a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?				
	Identify waste code(s) and off-site disposal facilities: Waste Code Receiving Facility				
268.7(a)(2)(i) and (ii)	b. Are LDR notifications and certifications provided for each shipment to the disposal facility?				
	c. Are characteristic wastes, which have been rendered non-hazardous (in a RCRA exempt unit), shipped to a Subtitle D facility?				
	Complete the following table: Waste Code Receiving Facility				
268.9(d)(1) 268.7(b)(5)	d. Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State?				
	43. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	a. Are wastes that are subject to a national capacity variance (Part 268, Subpart C) or a case-by-case extension (§268.5) shipped to a treatment, storage, or disposal facility?				
	Complete the following table: Waste Code Receiving Facility				
268.7(a)(3)	b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility?				
268.3	44. Dilution Prohibition:				
	a. Are prohibited* wastes with different treatment standards mixed? NOTE: See Appendix C for distinction between restricted and prohibited wastes.				
	List the wastes:				
55 FR 22666	b. Are the wastes amenable to the same type of treatment?				
55 FR 22665-22666	c. Are prohibited wastes diluted to:				
	1. Dilutes to meet treatment standards?				
	2. Dilutes to render waste non-hazardous?				
268.3(b)	d. Do wastes fall into the following categories:				
	1. Managed in treatment systems regulated under the Clean Water Act				
	2. Treatment standard specified in §§268.41 or 268.43?				
	e. If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
268.3(a)	f. Based on an assessment of points a and b, and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment?				

COMMENTS:

9.C. LAND DISPOSAL RESTRICTIONS CHECKLIST TRANSPORTER REQUIREMENTS

40 CFR CITATION	REGULATION	YES	NO	NA	NC
268.50(a)(3)	1. Does the transporter accumulate restricted wastes at a transfer facility for more than 10 days?				
	a. If yes, check the appropriate regulatory status: ___ Interim status for storage ___ RCRA permit for storage NOTE: The TSD checklist must also be completed.				
	b. If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:				
263.10(c)(2)	2. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? (If yes, the Generator checklist must also be completed.)				
	3. Are restricted wastes treated in RCRA exempt units (e.g., distillation units, wastewater treatment tanks, elementary neutralization)? (If No, do not complete this section.)				
	List types of waste treatment units and processes: Waste Code Type of Treatment Treatment Units and Process				
	a. Are treatment residuals generated from these units?				
	b. Are residuals further treated, stored at a transfer facility for greater than 10 days, or disposed on site? (If Yes, the TSD checklist must also be completed.)				

COMMENTS:

10. LANDFILLS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.301	**SECTION A - DESIGN REQUIREMENTS**				
264.301(c) 265.301(a)	1. Does landfill have two or more liners and a leachate collection system between the liners?				
265.301(b)	2. Did owner/operator notify Regional Administrator 60 days prior to receiving waste?				
264.301(d) 265.301(a)	3. If landfill does not have two liners and a leachate collection system, did owner/operator adequately demonstrate to the Regional Administrator that alternate design and operation prevents migration of hazardous constituents?				
264.301(e) 265.301(d)	4. If no double liner exists, does landfill fall into one of the following exemption categories:				
	a. Monofill only holds wastes from foundry furnace emission controls or metal casting molding sand?				
	AND b. Monofill has at least one liner and there is no evidence that liner is leaking; the monofill is more than 14 miles from an underground source of drinking water; and has ground-water monitoring?				
	OR c. Owner/operator demonstrates that monofill is located, designed, and operated to prevent migration of hazardous constituents?				
264.301(a) 265.301(c)	5. If landfill does not have two liners and a leachate collection system, does it have at least one liner for all existing portions?				
	a. If yes, does this liner provide for the following:				
Part 264	1. Prevent migration of wastes out of landfill to subsurface soil, ground water, and surface water?				
Part 264	2. A leachate collection and removal system immediately above the liner constructed to be chemically resistant to the waste and strong enough not to collapse under pressure?				
264.301(d) 265.301(c)	6. If owner/operator does not comply with No. 5 above, is he exempt after demonstrating to the Regional Administrator that alternate design and operation prevents migration of hazardous constituents?				
264/5.301(g), (h), (i), and (j)	**SECTION B - OPERATING REQUIREMENTS**				
	7. Are run-on controls preventing flow onto the active portion of the landfill?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	8. Is runoff collected and controlled?				
	9. Are collection and holding facilities emptied after storms?				
	10. Is the landfill managed so that wind dispersal is controlled?				
264.303	**SECTION C - MONITORING AND INSPECTION**				
	11. Are liners inspected for defects during and after construction?				
	12. Are landfills inspected weekly and after storms for defects?				
264/5.309	**SECTION D - SURVEYING AND RECORDKEEPING**				
	13. Does owner/operator retain records at the facility?				
	a. If yes, are the following maintained:				
	1. On map, exact location and dimensions, including depths, of each cell?				
	2. Contents of each cell and approximate location of each hazardous waste type within the cell?				
264/5.310	**SECTION E - CLOSURE AND POST-CLOSURE**				
	14. Is a closure plan kept on site?				
	a. If yes, does cover provide for the following:				
	1. Minimizing migration of liquids?				
	2. Minimum maintenance?				
	3. Promote drainage; minimize erosion of cover?				
	4. Accommodate settling and subsidence?				
	5. Less permeable than bottom liner or natural subsoils?				
	b. After final closure, does owner/operator provide for the following:				
	1. Maintain final cover?				
	2. Continue to operate leachate collection and removal system until leachate is no longer collected?				
	3. Maintain ground-water monitoring?				
	4. Prevent run-on and runoff from eroding and damaging cover?				
	5. Protect and maintain surveyed bench marks?				
264/5.312	**SECTION F - IGNITABLE AND REACTIVE WASTE**				
	15. Are ignitable or reactive wastes placed in the landfill?				
	a. If yes, do the waste and landfill meet all LDR requirements?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	b. If yes, is waste treated, rendered, or moved before or immediately after placement so that it is no longer ignitable or reactive?				
	16. Are ignitable wastes in containers placed in landfill?				
	a. If yes, attach a narrative describing how these wastes are handled to prevent ignition or reaction.				
264/5.313	**SECTION G - INCOMPATIBLE WASTES**				
	17. Does owner/operator place incompatible wastes in landfill?				
	18. If yes, is §264/5.17(b) complied with?				
264/5.314	**SECTION H - BULK AND CONTAINERIZED LIQUIDS**				
	19. Does landfill receive any bulk or containerized liquid hazardous waste?				
	a. If yes, have they been added to landfill since May 8, 1985?				
	20. Does landfill receive containers of free liquids?				
	a. If yes, is at least one of the following conditions met:				
	1. Have free-standing liquids been removed by decanting or other methods; or have they been mixed with absorbent or solidified?				
	2. Are containers ampoules?				
	3. Is container designed to hold free liquids?				
	4. Is container a lab pack?				
264.314(e)), (§265.314(f)	21. Have containers holding liquids that are not hazardous wastes been placed in the landfill since November 8, 1985?				
	a. If yes, is one of the following conditions met:				
	1. Was the only reasonable alternative to place it in a landfill or unlined surface impoundment?				
	2. Did placement not present a risk to contaminating any underground source of drinking water?				
264/5.315	**SECTION I - CONTAINER REQUIREMENTS**				
	22. Are containers placed in the landfill?				
	a. If yes, are they either:				
	1. 90 percent full?				
	2. Crushed, shredded, or similarly reduced in volume?				
264/5.316	**SECTION J - OVERPACKED DRUMS**				
	23. Are small containers of hazardous waste placed in landfill?				
	a. If yes, are the following requirements met:				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	1. Waste packaged in non-leaking container and tightly sealed?				
	b. Containers not overpacked according to DOT regulations?				
	c. Absorbent material does not react with waste?				
	d. Incompatible wastes not placed outside the same container?				
	e. Reactive waste treated or rendered nonactive before packaging?				
	f. Is such disposal in compliance with LDRs?				
264/5.317	**SECTION K - F020, F021, F022, F023, F026, AND F027 WASTES**				
	24. Are these wastes placed in landfill?				
	a. If yes, did owner/operator receive permission from the Regional Administrator to do so?				
	b. Is documentation of "a" above on file at the facility?				

COMMENTS:

11. LAND TREATMENT CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264.271	**SECTION A - TREATMENT PROGRAM**				
	1. Does facility follow an approved land treatment program?				
264.272	**SECTION B – TREATMENT DEMONSTRATION**				
	2. Has owner/operator demonstrated to Regional Administrator that hazardous wastes used in the program are completely degraded, transformed, or immobilized in the treatment zone?				
264.273 265.272	**SECTION C - OPERATING REQUIREMENTS**				
	3. Is run-on diverted away from the land treatment facility?				
	4. Is runoff from the land treatment facility collected?				
	5. Are holding facilities emptied after storms?				
	6. Is the runoff analyzed to see if it is a hazardous waste?				
	7. Is the facility managed to control wind dispersal?				
	8. Is the unit inspected weekly (Part 264)?				
265.273	**SECTION D - WASTE ANALYSIS**				
	9. If the runoff is considered hazardous, how is it handled? (Use narrative explanation sheet.)				
	10. If it is not a hazardous waste, is it discharged through a point source to surface waters?				
	a. If yes, list NPDES Permit No.				
	11. What hazardous wastes are treated at the land treatment facility? Subpart D Listed Wastes Characteristic Wastes				
	a. For these listed wastes, were analyses done to determine the concentrations of these constituents which caused the waste to be listed?				
	1. If yes, what are these concentrations? (Explain in comment section.)				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	b. For those characteristic wastes (TC) toxicity, what are the concentrations of the following: Concentration, mg/liter Waste Arsenic Barium Cadmium Chromium Lead Mercury Selenium Silver Endrin Lindan Methoxychlor Toxphene 2,4-D 2,4,5-TP silvex				
264/5.276	**SECTION E - FOOD CHAIN CROPS**				
	12. Are food-chain crops grown?				
	a. If yes, what are the concentrations of the following in the soil and vegetation: Soil Vegetation mg/liter mg/liter Arsenic Cadmium Lead Mercury				
265.276(a)	13. Did the facility notify Regional Administrator that it is growing food-chain crops?				
264.276(a)	14. Has owner/operator demonstrated that no harm is done to health or environment?				
265.276(b)	15. Has owner/operator demonstrated that any arsenic, lead, mercury, or other constituents under 265.273(b) will not be transported to crops?				
264.276(b) 265.276(c)	16. Does the facility treat waste that contains cadmium?				
	a. If yes, was the pH of the soil and waste mixture 6.5 or greater at the time of each waste application?				
	1. If the pH was less than 6.5, did the waste contain cadmium concentrations of 2 mg/kg or less?				
264/5.278	**SECTION F - UNSATURATED-ZONE MONITORING**				
265.278(a)	17. Is an unsaturated-zone monitoring plan kept at the facility?				
	18. Does owner/operator perform the following:				
	a. Soil monitoring?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	b. Soil-pore water monitoring?				
	c. Sample depths below waste incorporation?				
Part 264	d. Background values?				
	e. Consistent sampling and analysis procedures?				
	f. Determination of significant changes?				
	g. Notification when change is found?				
265.278(c)	19. Does plan include the following:				
	a. Depth of sampling?				
	b. Number of samples?				
	c. Frequency and timing of samples?				
	20. Does owner/operator analyze for hazardous waste constituents?				
264/5.279	**SECTION G - RECORDKEEPING**				
	21. Are records kept at the facility of:				
	a. Application dates?				
	b. Application rates?				
	c. Quantities?				
	d. Waste location?				
264/5.280	**SECTION H - CLOSURE AND POST-CLOSURE**				
	22. Is a copy of the closure/post-closure plan kept at the facility?				
265.280(a)	23. Does closure plan address the following:				
265.280(a)(1)	a. Control of the migration of hazardous waste and hazardous waste constituents from the treated area into the ground water?				
265.280(a)(2)	b. Control of the release of contaminated runoff from the facility into surface water?				
265.280(a)(3)	c. Control of the release of airborne particulate contaminants caused by wind erosion?				
265.280(a)(4)	d. Compliance with §265.276 concerning the growth of food-chain crops?				
264.280(a)	24. Does owner/operator ensure the following during closure:				
264.280(a)(1)	a. Continue all operations necessary to maximize degradation, transformation, or immobilization of hazardous constituents within the treatment zone?				
264.280(a)(2)	b. Minimization of run-off of hazardous constituents?				
264.280(a)(3)	c. Maintenance of run-on controls?				
264.280(a)(4)	d. Maintenance of runoff management system?				
264.280(a)(5)	e. Wind dispersal control?				
264.280(a)(6)	f. Continue to comply with any prohibitions or conditions concerning growth of food-chain crops?				
264.280(a)(7)	g. Continue unsaturated-zone monitoring in compliance with §264.278?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264.280(a)(8)	h. Establish a vegetative cover on the portion of the facility being closed at such time that the cover will not substantially impede degradation, transformation, or immobilization of hazardous constituents in the treatment zone?				
264.280(c)	25. During post-closure care, does owner/operator:				
264.280(c)(1)	a. Continue all operations (including pH control) necessary to enhance degradation and transformation and sustain immobilization of hazardous constituents in the treatment zone?				
264.280(c)(2)	b. Maintain a vegetative cover over closed portions of the facility?				
264.280(c)(3)	c. Maintain the run-on control system required under §264.273(c)?				
264.280(c)(4)	d. Maintain the runoff management system required under §264.273(d)?				
264.280(c)(5)	e. Control wind dispersal of hazardous waste if required under §264.273(f)?				
264.280(c)(6)	f. Continue to comply with any prohibitions or conditions concerning growth of food-chain crops under §264.276?				
264.280(c)(7)	g. Continue unsaturated-zone monitoring in compliance with §264.278?				
265.280(e)	26. Does facility have certification that closure was performed according to plan?				
Part 265	a. Was certification submitted to Regional Administrator?				
265.280(f)	27. Does owner/operator continue the following during post-closure?				
265.280(f)(1)	a. Soil-pore monitoring by collecting and analyzing samples as specified in the plan?				
265.280(f)(2)	b. Restrict access?				
265.280(f)(3)	c. Assure that growth of food-chain crops is in compliance?				
265.280(f)(4)	d. Control wind dispersal?				
264/5.281	**SECTION I – IGNITABLE OR REACTIVE WASTES**				
	28. Are ignitable or reactive waste placed in the facility?				
	a. If yes, are the wastes treated, rendered, or mixed before or after placement in the landfill so it is no longer reactive or ignitable?				
	b. Describe or attach a copy of treatment.				
264/5.282	**SECTION J – INCOMPATIBLE WASTES**				
	29. Are incompatible wastes placed in the facility?				
	a. Are the incompatible wastes placed in different locations in the facility?				

COMMENTS:

12. SURFACE IMPOUNDMENTS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.221	**SECTION A - DESIGN AND OPERATING REQUIREMENTS**				
	1. Does the facility operate one or more surface impoundments?				
264.221(c) 265.221(a)	a. If yes, has owner/operator installed two or more liners and a leachate collection system for any new units, replacement of any existing units, or lateral expansion of units?				
264.221(d) 265.221(a)	b. Is owner/operator exempt from double-liner leachate collection system requirements because Regional Administrator has determined that impoundments design will prevent the migration of hazardous constituents?				
265.221(b)	c. Did owner/operator notify Regional Administrator 60 days prior to receiving waste?				
264.221(e) 264.221(d)	d. If impoundment does not have a double liner, is it exempt due to one of the following reasons?				
	1. Monofill contains only wastes from a foundry furnace emission controls or metal casting molding sand				
	2. Monofill has at least one liner for which there is no evidence of leaking				
	3. Monofill is located, designed, and operated to ensure that no migration of constituents into ground or surface water occurs				
264.221(g)	e. Does owner/operator take measures to prevent overtopping resulting from overfilling; wind and wave action; rainfall; run-on; malfunctions of level controllers, alarms, and other equipment; and human error?				
264.221(h)	f. Is impoundment surrounded by dikes?				
265.221	**SECTION B - OPERATING REQUIREMENTS**				
	2. Does owner/operator maintain at least 60 cm (2 ft) of freeboard (Part 265)?				
	a. If no, does owner/operator have certification by a qualified engineer?				
265.223	**SECTION C - CONTAINMENT SYSTEM**				
	3. Do all earthen dikes have a protective cover (e.g., grass, gravel) to minimize erosion?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
265.225	**SECTION D – WASTE ANALYSIS AND TRIAL TESTS**				
	4. Are wastes treated in the surface impoundment? (if yes, explain in comment section.)				
	5. Has the owner/operator chemically treated a waste (or plans to) which is substantially different from previously treated wastes?				
	6. Has the owner/operator chemically treated a waste (or plans to) using a process that is substantially different from that previously used?				
	7. If yes to 2 or 3 above, have waste analyses and trial treatment tests been conducted?				
	a. If not, does owner/operator have written documentation on similar treatment of similar wastes?				
264/5.226	**SECTION E - MONITORING AND INSPECTION**				
Part 265	8. Does owner/operator check freeboard level daily?				
Part 265	9. Are the surface impoundment, dikes, and surrounding vegetation inspected weekly for deterioration or failures?				
	10. If regulated under Part 264, does owner/operator:				
	a. Inspect liners for imperfections (tears and punctures for synthetic liners and cracks, root holes, etc., for soil-based liners) during construction and installations?				
	b. Inspect the operating impoundment weekly and after storms to detect evidence of deterioration, malfunction, and overtopping?				
	c. Have certification that the dike will withstand stresses from the amount and type of waste to be held and will not fail due to cleaning?				
264.227	**SECTION F – EMERGENCY REPAIRS; CONTINGENCY PLANS**				
264.227(c)	11. Does facility have a contingency plan?				
264.227(a)	a. If yes, does plan stipulate that impoundment be removed from service under the following conditions:				
	1. Sudden drop in liquid level?				
	2. Leaking dike?				
264.227(b)	b. Does plan detail the steps to be followed when removing impoundment from service, including:				
	1. Shutting off flow into impoundment?				
	2. Containing any surface leakage?				
	3. Stopping the leak?				
	4. Taking measures to prevent catastrophic failure?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	5. Notifying Regional Administrator of problems in writing if leaks cannot be contained?				
264.227(d)	c. If impoundment was removed from service, did owner/operator take the necessary precautions to rectify problems and to obtain certification before restoring impoundment to service?				
264.227(e)	d. If impoundment was removed from service and was not restored to service, was impoundment closed in accordance with an approved closure plan?				
264/5.228	**SECTION G - CLOSURE AND POST-CLOSURE**				
	12. Is a closure plan retained at the facility?				
	13. At closure, did owner/operator:				
265.228(a)	a. Remove standing liquid?				
265.228(a)(1)	b. Remove waste and waste residue?				
265.228(a)(1)	c. Remove liner?				
264/5.228 (a)(1)	d. Remove underlying and surrounding contaminated soil?				
Part 265	e. If not, did owner/operator demonstrate to Regional Administrator that the above materials were nonhazardous?				
265.228(a)(2)	1. If no, has owner/operator closed the impoundment and provided post-closure care?				
	14. If regulated under Part 264, has owner/operator:				
264.228(a)(1)	a. Removed or decontaminated waste residues, contaminated system components, subsoils, structures, and equipment, and managed them as hazardous waste?				
264.228 (a)(2)(i)	b. Eliminated free liquids by removing or solidifying remaining wastes or waste residues?				
264.228 (a)(2)(ii)	c. Stabilized remaining wastes to a bearing capacity sufficient to support final cover?				
264.228 (a)(2)(iii)	d. Covered the impoundment with final cover?				
264.228(b)	15. Did owner/operator leave any residuals in place at closure?				
264.228(b)(1)	16. In post-closure, does owner/operator maintain integrity of cover, maintain and monitor the leak detection system and ground-water monitoring system, and prevent run-on and runoff?				
264/5.229	**SECTION H - IGNITABLE AND REACTIVE WASTES**				
	17. Are ignitable or reactive wastes placed in the impoundment?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	a. If yes, are they treated, rendered, or mixed before or immediately after placement in the impoundment so they no longer meet the definition of ignitable or reactive?				
	b. 1. If yes, is the waste managed so that it is protected from any conditions which may cause it to ignite or react and is the owner/operator maintaining and monitoring the leak detection system?				
	OR 2. If yes, has the owner/operator obtained a certification that the design features or operating plans of the facility will prevent ignition or reaction?				
	OR c. Is the impoundment used solely for emergencies?				
264/5.230	**SECTION I – INCOMPATIBLE WASTE**				
	18. Are incompatible wastes placed in the impoundment?				
	a. If yes, has the owner/operator taken precautions to prevent accidental ignition or reaction?				
	FOR FACILITIES REGULATED UNDER PART 264:				
	SECTION J - SPECIAL REQUIREMENTS FOR HAZARDOUS WASTES F020, F021, F022, F023, F026, F027 (40 CFR 264.231)				
	19. Does the impoundment contain hazardous waste numbers F020, F021, F022, F023, F026, F027?				
	a. If yes, does the owner/operator operate the impoundment in accordance with a management plan approved by the Regional Administrator or comparable state authority?				

COMMENTS:

13. THERMAL TREATMENT CHECKLIST

NA = Not Applicable, NC = Non-Compliance

NOTE: Applies to thermal treatment of hazardous waste in devices other than incinerators.

40 CFR CITATION	REGULATION	YES	NO	NA	NC
265 SUBPART P	**SECTION A - OPERATING REQUIREMENTS**				
265.373	1. Is the process a noncontinuous (batch) process?				
	a. If no, is the process operating at steady-state conditions (including temperature) before adding hazardous waste?				
265.375	b. Is a waste analysis documented in the operating record that includes:				
	1. Heating value?				
	2. Halogen content?				
	3. Sulfur content?				
	4. Concentration of lead?				
	5. Concentration of mercury?				
	NOTE: 4 and 5 not required if facility has written documented data that show the elements are not present.				
265.377	2. Does the owner/operator monitor the following when thermally treating hazardous wastes:				
265.377(a)(1)	a. At least every 15 minutes, existing instruments which relate to the temperature and emission control:				
	1. Waste feed?				
	2. Auxiliary fuel feed?				
	3. Treatment process temperature?				
	4. Relevant process flow?				
	5. Relevant level controls?				
265.377(a)(2)	b. Stack plume (emissions) at least hourly:				
	1. Color (normal)?				
	2. Opacity?				
265.377(a)(3)	c. Thermal treatment process equipment at least daily:				
	1. Pumps, valves, conveyors, pipes, etc., for leaks, spills, and fugitive emissions?				
	2. Emergency shutdown controls?				
	3. System alarms?				
	d. Construction materials of the treatment process or equipment at least weekly to detect corrosion or leaking of fixtures or seams?				
	e. Construction materials of the area immediately surrounding discharge confinement structures at least weekly?				
265.381	**SECTION B - CLOSURE**				
	3. Is a closure plan maintained at the facility?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
265.382	**SECTION C - OPEN BURNING**				
	4. Is there evidence of any open burning of hazardous waste? (Use narrative explanation sheet)				
	5. Is open burning or detonation of waste explosives conducted?				
	a. If yes, is the detonation performed in accordance with the following table: Pounds of waste explosives or propellants — Minimum distance from open burning detonation to the property of others 0-100: 204 m (670 ft) 101-1,000: 380 m (1250 ft) 1,001-10,000: 530 m (1730 ft) 10,001-30,000: 690 m (2260 ft)				
265.383	**SECTION D - PARTICULAR HAZARDOUS WASTE**				
	6. Does owner/operator burn F020, F021, F022, F023, F026, and/or F027 wastes?				
	a. If yes, does owner/operator have documented permission from Assistant Administrator for Solid Waste and Emergency Response to do so?				
	SECTION E – IGNITABLE OR REACTIVE WASTE				
	7. Are ignitable or reactive wastes placed in the treatment process?				
	a. If yes, is the waste treated, rendered, or mixed before or immediately after being placed in the treatment process so it no longer meets the definition of ignitable or reactive?				
	DESCRIBE OR ATTACH A COPY OF THE TREATMENT.				
	SECTION F - INCOMPATIBLE WASTES				
	8. Are incompatible wastes placed in the same treatment process or equipment?				
	9. Are hazardous wastes placed in washed equipment if equipment previously held incompatible waste?				

COMMENTS:

14. TRANSPORTER CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATION	REGULATION	YES	NO	NA	NC
263.11	**SECTION A – EPA I.D. NO.**				
	1. Does transporter have an EPA I.D. No.?				
	a. If yes, what is EPA I.D.?				
9VAC 20-60-420.E	b. Does the transporter have a valid Virginia Hazardous Waste Transporter Permit?				
263.12	**SECTION B – TRANSFER FACILITY REQUIREMENTS**				
	2. Does transporter store wastes at a transfer facility?				
	a. If yes, does transporter store wastes longer than 10 days?				
263.20	**SECTION C – MANIFESTS**				
	3. Does transporter use manifests?				
	a. If yes, are manifests signed and dated?				
263.20(b)	b. Does transporter return signed copies of manifests to generators?				
263.20©	c. Does transporter carry manifests with waste shipments?				
263.20(d)(1)	d. Does transporter obtain delivery date and signature of next transporter or owner/operator of designated facility at delivery?				
263.20(d)(2)	e. Does transporter retain copies?				
263.20(d)(3)	f. Does transporter give remaining copies to accepting transporter or facility?				
263.20(e)	g. Is transporter a water (bulk shipment) transporter?				
263.20(e)(1)	1. If yes, is waste delivered to receiving facility by water?				
263.20(e)(2)	2. Does transporter carry a shipping paper with the waste containing all information required on the manifest (excluding EPA I.D. numbers, generator certification, and signatures)?				
263.20(e)(3)	3. Does transporter obtain delivery date and handwritten signature of owner/operator of designated facility on manifest or shipping paper?				
263.20(e)(5)	4. Does transporter retain copies of shipping papers or manifests, in accordance with §263.22?				
263.20(f)	h. Is transporter a rail transporter?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
263.20(f)(1)(i)	1. If yes, when accepting waste from a non-rail transporter, does rail transporter sign and date manifest acknowledging acceptance of waste?				
263.20(f)(1)(ii)	2. Does rail transporter return a signed copy of manifest to non-rail transporter?				
263.20(f)(1)(iii)	3. Does rail transporter forward manifest copies to:				
	a. The next non-rail transporter?				
	OR b. Designated receiving facility (if reached by rail)?				
	OR c. The last rail transporter designated to handle the waste in the U.S.?				
263.20 (f)(1)(iv), and 263.22©	4. Does rail transporter retain a copy of manifest?				
263.20(f)(2)	5. Does rail transporter ensure that a shipping paper accompanies the hazardous waste and contains all information required on manifest (excluding EPA I.D., generator certification, and signatures)?				
263.20 (f)(3) and (4)	6. Does rail transporter obtain delivery date and handwritten signature of owner/operator of designated facility or the next non-rail transporter on manifest?				
263.20 (f)(3) and (4)	7. Does rail transporter retain a copy of the manifest or signed shipping paper?				
263.20(g)	i. Does transporter transport waste outside of the U.S.?				
	1. If yes, does the transporter:				
	a. Indicate on manifest the date that shipment left the U.S.?				
	b. Sign manifest and retain one copy?				
	c. Return a signed copy of manifest to generator?				
263.21	**SECTION D - COMPLIANCE WITH THE MANIFEST**				
263.21(a)	4. Does transporter deliver entire shipment of hazardous waste to:				
	a. Designated facility listed on manifest?				
	b. Alternate designated facility, if emergency prevents delivery to designated facility?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	c. Next designated transporter?				
	d. Place outside U.S. designated by generator?				
263.21(b)	e. If no, does transporter contact generator for further directions, and then revise manifest accordingly?				
263.22	**SECTION E – RECORDKEEPING**				
263.22(a)	5. Does transporter keep a copy of manifest signed by generator, him/herself, and next designated transporter for 3 years from the date the hazardous waste was accepted by the initial transporter?				
263.22(b)	6. Does water (bulk shipment) transporter retain copy of shipping paper for each shipment delivered by water for 3 years from the date the hazardous waste was accepted by the initial transporter?				
263.22©	7. Does initial rail transporter keep a copy of manifest and/or shipping paper for 3 years from the date the hazardous waste was accepted by the initial transporter?				
263.22(d)	8. Does transporter shipping waste outside of the U.S. keep for 3 years copy indicating that waste was shipped from the date the hazardous waste was accepted by the initial transporter?				

COMMENTS:

15. WASTE INFORMATION CHECKLIST

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	WASTE NAME:				
	Process generating the waste:				
	How has facility classified the waste:				
	Hazardous? (If so, list waste code)				
	Non-hazardous?				
	How has facility made this determination: (§262.11)				
	Testing?				
	Process knowledge?				
	Are any test results available? (If yes, be sure to look at results)				
	Waste generation rate:				
	Disposal procedure:				
	Current:				
	Past:				
	Have manifests been used for off-site shipment? (If so, be sure to look at manifests) (§262.20)				
	Is waste subject to land disposal restrictions under 40 CFR 268?				
	Is waste subject to exclusions under 40 CFR 261.4?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC

40 CFR CITATION	REGULATION	YES	NO	NA	NC

COMMENTS:

16. WASTE PILES CHECKLIST

40 CFR CITATION	REGULATION	YES	NO	NA	NC
264/5.250	**SECTION A - DESIGN AND OPERATING REQUIREMENTS**				
264.251(j) 265.251(j)	1. Is the pile containing hazardous waste protected from wind?				
264.251(a)	2. Does waste pile have a liner and leachate collection system?				
264.251(b)	a. If no, has facility proved to Regional Administrator that waste pile's design characteristics and location will prevent migration of hazardous constituents into ground water?				
264.251(g)	3. Is run-on diverted around active portion?				
264.250(h)	4. Is runoff collected and controlled?				
264.251(i)	5. Are collection and holding facilities emptied after storms?				
265.252	**SECTION B - WASTE ANALYSIS**				
	6. Is a representative sample of waste from each incoming shipment analyzed before the waste is added to the pile to determine the compatibility of the wastes?				
	7. Does the analysis include a visual comparison of color or texture?				
265.253	**SECTION C - CONTAINMENT**				
	8. Is the leachate or runoff from the pile considered a hazardous waste?				
265.253(a)	a. If yes, is the pile managed with the following:				
	1. An impermeable base compatible with the waste?				
	2. Run-on diversion?				
	3. Leachate and runoff collection?				
	4. Are collection and holding facilities periodically emptied?				
265.253(b)	OR 5. Is the pile protected from precipitation and run-on by some other means?				
264.254	**SECTION D - MONITORING AND INSPECTION**				
264.254(a)	9. Are liners and covers inspected for damage during construction?				
264.254(b)	10. Are waste piles inspected weekly and after storms for deterioration, run-on and runoff controls, wind dispersal control, and proper function of leachate collection system?				
264/5.256	**SECTION E - IGNITABLE OR REACTIVE WASTES**				
264/5.256(a)	11. Are ignitable or reactive wastes placed in the pile?				
	a. If yes, is the waste treated, rendered, or mixed so that the addition of the resulting waste results in the waste or mixture no				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	longer meeting the definition and complies with §264.17(b)? (Describe procedure in comments section.)				
264.256(b) 265.256(a)(2)	OR b. Is the waste protected from sources of ignition or reaction?				
	1. If yes, use narrative explanation sheet to describe separation and confinement procedures.				
	2. If no, use narrative explanation sheet to describe sources of ignition or reaction.				
264/5.257	**SECTION F - INCOMPATIBLE WASTES**				
	12. Are incompatible wastes placed together in the pile?				
264/5.257(b)	13. Are incompatible wastes separated from each other by a dike, berm, or wall?				
	14. Is there evidence of fire, explosion, gaseous emissions, leaching, or other discharge? (Use narrative explanation sheet.)				
264/5.258	**SECTION G - CLOSURE AND POST-CLOSURE**				
	15. Is a closure plan retained at the facility?				
264/5.258(a)	16. At closure, were all waste residues, contaminated system components, contaminated subsoils, and structures and equipment contaminated with waste or leachate, removed or decontaminated?				
264/5.258(a)	17. Were all contaminated subsoils removed from the site?				
	a. If no, did owner/operator close the facility and perform closure and post-closure care in accordance with §264.310 and 265.310?				
264.258(b)	18. Is a plan for complying with No. 2 above included in closure plan?				
264.258 (c)(1)(i)	19. Is a contingency plan for complying with No. 3a above included in the plan?				
264.258 (c)(1)(ii)	20. Is a contingency post-closure plan included?				
264.258(c)(2)	21. Are cost estimates for the contingent closure and post-closure plan included in closure plan?				
264.259	**SECTION H - REQUIREMENTS FOR WASTE F020, F021, F022, F023, F026, AND F027**				
	22. Does facility place these F wastes in a waste pile?				
	a. If yes, does facility have an approved management plan for these wastes?				

COMMENTS:

17. RCRA WASTE MINIMIZATION CHECKLIST

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	SECTION A - STATUTORY/REGULATORY REQUIREMENTS				
262.20(a)	1. Has the manifest been certified by an authorized representative?				
262.20(a)	2. Has the waste minimization statement on the manifest been altered or deleted?				
262.20(a) 264/5.75	3. Does the facility have a written description of their waste minimization program?				
	If a written description is not provided, can the facility personnel provide a verbal description of the waste minimization program?				
	4. Is there any visual evidence of the facility's waste minimization efforts? If yes, describe the activities/program observed in the comment section.				
	5. Does the description in the biennial report and/or annual export reports include:				
262.41(a)(6) 262.56(a)(5)(i) 264/265.75(h)	a. A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated?				
262.41(a)(7) 262.56(a)(5)(ii) 264/265.75(i)	b. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years?				
262.41(a)(8) 262.56(a)(6) 264/265.75(j)	c. Certification by the generator or authorized representative? (§262.56(a)(6) requires certification by primary exporter, §§264/5.75(j) requires certification by the owner/operator or authorized representative.)				
264.73(b)(9)	6. For permitted facilities, does the operating record contain a certification by permittee (at least annually) that the permittee has a program in place to reduce the volume and toxicity of the hazardous wastes?				
	SECTION B - PERMIT/ENFORCEMENT REQUIREMENTS				
	7. Does the facility's permit contain any waste minimization requirements? If yes, briefly describe in the comment section whether the requirements and indicate if they have been met.				
	SECTION C - PERMIT/REGULATORY REQUIREMENTS				
	8. Are there waste minimization requirements contained in enforcement orders or settlement agreements with the facility? If yes, briefly describe in the comment section whether the requirements and indicate if they have been met.				

COMMENTS:

18. TANKS CHECKLIST

NA = Not Applicable, NC = Non-Compliance

40 CFR CITATATION	REGULATION	YES	NO	NA	NC
	1. Which of the following describes the tank(s) employed at this facility? a. Indoor – not on permeable floor b. Indoor – on permeable floor c. Outdoor – above ground d. Outdoor – in ground e. Outdoor – underground				
265.191	2. Does the tank(s) appear to be in good condition? (If no, describe in the Comments.)				
265.193	3. Is the tank(s) provided with an effective secondary containment system? (If yes, describe in Comments.)				
265.191(a)	a. If no, does the facility have a written assessment reviewed and certified by an independent, qualified, registered professional engineer that attests to the tank(s)'s structural integrity?				
265.191(b)	4. Was a leak test performed on the tank(s)?				
265.194(b)	5. Is the tank(s) provided with adequate controls to prevent spills or overflows (i.e. automatic feed cutoff, by pass to another unit, high level alarms, etc.)				
265.194(b)	6. Is there sufficient freeboard (2 feet) in uncovered tank(s) to prevent overtopping by wave or wind action or precipitation?				
265.195(a)	7. Is tank(s) inspected each operating day?				
265.195(a)(1)	If yes, do inspections include: a. Overfill/spill control equipment?				
265.195(a)(2)	b. Above ground portions of the tank(s) for corrosion or releases?				
265.195(a)(3)	c. Data gathered from monitoring equipment and leak detection equipment?				
265.195(a)(4)	d. Area immediately surrounding the externally accessible portion of the tank(s) and secondary containment system for signs of erosion and releases?				
265.195(b)(4)	8. Does the facility perform annual inspections of the cathodic protection system, if present?				
265.195(c)	9. Does the facility properly document all of the results of its tank system inspections?				

40 CFR CITATATION	REGULATION	YES	NO	NA	NC
265.196	10. Is there any indication that the facility did not properly respond to spills or leaks from a tank(s) (this would include failure to stop the spill/leak, failure to clean up spilled/leaked material, failure to minimize migration, failure to remove tank(s) from service immediately, failure to provide notification, etc.)? If yes, describe in Comments.				
	11. Does the facility store any ignitable or reactive waste in its tanks(s)? If yes, describe in Comments.				
265.198(a)(1)	a. Is the waste treated, rendered or mixed before or immediately after placement in the tank(s) so that it no longer meets the definition of ignitable or reactive waste?				
265.198(a)(2)	b. Is the waste stored in such a way that it is protected from any material or condition that may cause the waste to ignite or react?				
265.198(a)(3)	c. Is the tank(s) used solely for emergencies?				
265.198(b)	d. Does the tank(s) appear to be a safe distance from the facility's property line and public thoroughfares? If no, describe in the Comments.				
	12. Is there any indication that incompatible wastes are being stored in a tank(s)?				
265.199(a)	If yes: a. Is there any evidence of extreme heat or pressure, fire or toxic emissions occurred? If yes, describe in Comments.				
265.200	13. Are waste analysis conducted or written documentation obtained before placing a substantially different hazardous waste into a tank(s)?				

COMMENTS:

18.A. HAZARDOUS WASTE TANK SYSTEM CHECKLIST SMALL QUANTITY GENERATOR

40 CFR CITATION	REGULATION	YES	NO	NA	NC
265.201	**SECTION A – TANK DESCRIPTION**				
	1. Tank volume (gallons):				
	2. Tank description (i.e., aboveground, steel, lined):				
	3. Tank location (i.e., inside on cement floor, outside on asphalt):				
	SECTION B – MATERIAL STORED				
	4. Material stored (be specific, i.e., 20% methylene chloride, 30% 1,1,1-trichloroethane): Waste Code Waste Description				
	5. Does this tank ever contain waste other than the above?				
	6. If so, list other waste(s): Waste Code Waste Description				
	7. Are hazardous wastes placed in tanks that are compatible with the waste so that the tank or inner liner may not fail prematurely?				
	SECTION C – RECORDKEEPING AND INSPECTIONS				
	8. Are wastes being stored in tanks for greater than 180 days?				
	9. Is the disposal site greater than 200 miles away?				
	10. Are wastes being stored in tanks for greater than 270 days?				

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	11. For SQGs who store waste greater than 180 days (270 days if shipped over 200 miles) or who exceed 6,000 kg limit, has the owner/operator applied for an operating permit?				
	12. Does the owner/operator inspect the tank system routinely for the following:				
	a. Discharge control equipment each operating day?				
	b. Data from monitoring equipment (i.e., gauges) each operating day?				
	c. Level of waste in tank each operating day?				
	d. Materials for signs of corrosion weekly?				
	e. Area around tank for spills or leaks weekly?				
	SECTION D – SPECIAL WASTES				
	13. Is the owner/operator storing ignitable or reactive wastes so that it does not generate heat, fire, violent reactions, gases that are flammable, toxic dusts, or other means to threaten human health?				
	14. Does the owner/operator follow appropriate procedures for reactive or ignitable wastes?				
	SECTION E – TANK CONDITION				
	15. Is the tank labeled "Hazardous Waste?"				
	16. Tank condition: Are any of the following conditions present:				
	a. Discolored paint or rust anywhere on tank system?				
	b. Blister, cracks, bulges or other signs of potential failure?				
	c. Worn hoses, rips in liners?				
	17. Does the area around the tank show any evidence of spills (i.e., discoloration, dead vegetation)?				
	18. Are uncovered tanks operating with a minimum of 2 feet (60 cm) freeboard or are they equipped with containment structure?				
	19. In tanks with continuous feed systems, is the system equipped with a cut-off or by-pass system?				
	SECTION E – PREPAREDNESS AND PREVENTION				
	20. Is there an emergency response plan?				
	21. In an internal communication or alarm system available?				
	22. Is a telephone or other device capable of summoning emergency assistance from local police, fire, or other emergency response teams available?				
	23. Are portable fire extinguishers and spill control equipment available and in operational condition?				
	24. Water available to supply water hose streams?				

COMMENTS:

Name of Facility:_____

Address:_____

_____

Facility Representative:_____

Phone Number:_____

DEQ representative:_____

Date:_____

Has the facility filed for a tax credit under Article 2 (Section 58.1-439.10 et seq.) and Article 10 (58.1-400 et seq.) for used oil burning equipment?

Does the facility take do-it-yourself ("DIY") waste motor oil from the public?
[please note if the facility maintain logs for waste motor oil accepted from the public, sign-in sheets, etc., or if they post acceptance hours/criteria or a used oil sign. Although this is not required under the tax credit language, it may assist to verify used motor oil acceptance from the public.)

Does the facility have the subject space heater (or other oil burning equipment) on-site and operational? When was it purchased?

In what year did they make the tax credit claim? _____

Did they collect used motor oil from the public during that year, or subsequently?

Do they currently collect used motor oil from the public?

Comments:

PLEASE RETURN THE COMPLETED QUESTIONNAIRE TO DAN GWINNER, DEQ CENTRAL OFFICE

Subpart CC Facilities
Date_____

Facility Name_____
EPA ID #_____

SUBPART CC FACILITIES

NOTE: This checklist does not apply to satellite accumulation areas, containers less than 26 gallons, or small quantity generators.

40 CFR CITATION	REGULATION	YES	NO	NA	NC
	SECTION A – GENERAL				
265.1080	1. Does the facility claim that the subpart CC regulations are not applicable to their waste management unit(s) or that the unit(s) are excepted or exempted from regulation (265.1080(b), 265.1083(c), or 265.1)? **Explain in the Comments section.**				
265.1083(c)(1)	2. If the waste management unit(s) are exempt because the volatile organic compound (VOC) concentration of the waste is <500 ppmw, does the facility have VOC determination records?				
265.1084(a)(1)	3. Does the facility determine the VOC content of its hazardous waste at the point of waste origination?				
265.1084(a)(4)	4. Does the facility maintain documentation for a knowledge-based determination of the waste stream's volatile organic concentration?				
265.1084(a)(3)	5. If the determination was made by sampling and testing, does the facility have a written sample and analysis plan for waste characterization?				
265.1089	6. Does the facility have a written plan and schedule to perform air emission control equipment inspections and monitoring?				
265.1090(a)	7. Does the facility maintain inspection records on-site for at least three years from the date of the inspection?				
	SECTION B – TANKS				
265.1085	**NOTE: <u>Floating roof tanks</u> are not known to be in use by Virginia generators. If one of these systems is encountered, refer to the complete requirements of 265.1085 (f) or (g) for these units and discuss in the Comments section. This section would generally be N/A.**				
265.1085(b)(2)	8. Are tanks used for waste stabilization? **(must be using Level 2 controls)**				
265.1085(b)	9. If a fixed roof tank **(Tank Level 1 Controls)** is used for the storage of a hazardous waste with >500ppmw VOC, is the maximum vapor pressure determination of the waste maintained in the facility records?				
265.1085(b)	10. Is the maximum organic vapor pressure less than cutoff for the tank design capacity, or the waste not heated to or above temperatures at which the vapor pressure was determined? **(Tank Level 1 Controls)**				
265.1085(c)(1)	11. Has the operator determined the maximum organic vapor pressure for the initial waste, and for any subsequent changes in the composition of waste being managed? **(Tank Level 1 Controls)**				

265.1085(c)(2)	12. Is the tank equipped with a fixed roof designed to provide a continuous barrier, with no open spaces, and with each opening or manifold equipped with a closure device *or* connected by a closed vent system to a control device? **(Tank Level 1 Controls)**				
265.1085(c)(4)	13. Does the owner/operator inspect the tanks air emissions control equipment?				
265.1085(d)	14. Are tanks for which there is no maximum vapor pressure determination one of the following: fixed roof with internal floating roof, external floating roof, fixed roof vented to a control device, pressure tank, or tank located within an enclosure vented to a control device? **(All following are Tank Level 2 Controls) (Note: in VA, these are usually pressure tanks, enclosure vented through a closed-vent system, or a fixed-roof venting to a control device)**				
265.1087(g)	15. For a fixed-roof tank vented to a control device: Does the fixed roof form a continuous barrier? Are emissions vented to a control device? Are all openings not venting to the control device fixed with a closure device? Are the cover and closure devices closed at all times except when necessary to access them? Is the closed vent system and control device operated in accordance with 265.1088? Does the operator inspect the air emissions control equipment?				
265.1087(h)	16. For a pressure tank: Is the tank designed so as not to vent to the atmosphere during filling? Are all tank openings equipped with closure devices designed to operate with no detectable organic emissions? Are there safety devices in the tank? Is the tank operated as a closed system except when a safety device opens to avoid an unsafe situation? Does the operator inspect the air emissions equipment?				
265.1087(i)	17. For an enclosure vented to an enclosed combustion control device: Is the hazardous waste tank inside an enclosure that meets the criteria for a permanent total enclosure under Procedure T? Is the enclosure vented to a combustion device operated in accordance with 265.1088? Is the closed-vent system and control device inspected and monitored?				
265.1087(k)	18. **For all tanks:** If any defects were found during operator inspections of tanks , were repair attempts made within 5 days, and completed not later than 45 days after discovery?				

	SECTION C – CONTAINERS				
	NOTE: CC applies to containers of HW with an average VO concentration of >50ppmw Light Liquid Service – vapor pressure of one or more organic constituents is > 0.3 kilopascals (0.044psi) at 20 C with the total concentration of organic constituents >= 20% by weight. Levels of applicability: Level One – containers >26.4 gal <= 119 gal, meet DOT standards, use cover and closure device with no gaps, *or* use vapor suppressing barrier Level Two – containers > 122 gal and in light liquid service, meet DOT specifications, no detectable emissions, demonstrated to be vapor tight within last 12 months Level Three – container can be used for waste treatment by stabilization, vent vapors from containers and remove or destroy in control device, put in an enclosure and vent vapors and destroy them in a control device				
	19. What level of emission control is the facility using to comply with Subpart CC container requirements? L-1 L-2 L-3 None				
265.1087(c)(1)	20. Level 1 – are the container(s), if > 26 gallons, approved for hazardous waste transportation use by the U.S. DOT?				
265.1087(c)(2)	a. Is the container cover composed of suitable materials to minimize hazardous waste to the atmosphere?				
265.1087(c)(3)	b. Are container covers and closure devices secured and provide no detectable organic emissions when all container openings are secured? *(covers must be secured except when adding or removing waste)*				
265.1087(c)(4)(iii)	c. In the case of a defective container, cover, or closure device, has repair been attempted within 24 hrs. of detection or been repaired no later than 5 calendar days after detection?				
265.1087(c)(5)	21. Does the facility maintain a copy of the procedure used to determine that containers >122 gallons which do not meet applicable DOT regulations are not managing hazardous waste in light material service?				
265.1087(d)(1)	22. Level 2 – are containers >122 gallons approved for U.S. Dot transportation packaging use?				
	a. Is the container operated with no detectable organic emissions?				
	b. Has the container been demonstrated within the last 12 months to be vapor tight?				
265.1087(d)(3)	c. Is the container cover secured except when adding and removing waste?				
265.1087(d)(4)	d. In the case of a defective container, cover, or closure device, has repair been attempted within 24 hrs. of detection or been repaired no later than 5 calendar days after detection?				

265.1087(b)(2)	23. Level 3 – Are any container(s) larger than 26 gallons used for treatment of HW by waste stabilization? **Please describe the process in Comments and include a process diagram.**				
265.1087(e)(1)	a. If yes, are the container(s) vented to a control device or located within an enclosure vented to a control device?				
265.1087(e)(2)	b. Does the container enclosure meet the requirements of "Procedure-T" and the system operated in accordance with 265.1088?				
265.1087(e)(6)	c. During waste transfers, does the system meet the waste transfer requirements of this section by using a submerged fill-pipe, a vapor balancing system, or a fitted opening?				
	SECTION D – SURFACE IMPOUNDMENTS				
265.1086(b)(1)	24. If the facility operates a surface impoundment subject to the CC requirements, has either a floating membrane cover or a cover vented to a control device been installed?				

COMMENTS:

DEPARTMENT OF ENVIRONMENTAL QUALITY

CHECKLIST FOR RCRA INSPECTION OF TRANSPORTERS

FACILITY NAME:

EPA ID NUMBER:

INSPECTION DATE:

VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

VHWMR Section 9 VAC 20-60-

PART/ SECTION	REGULATION	YES	NO	P/V
420.A	Does the company transport hazardous waste which			
	Originates within the Commonwealth?			
420.D.1	Originates within another state or a foreign county? yes, for foreign country, complete large quantity generator (LQG) checklist)			
	Terminates within the Commonwealth.			
	If yes to a, b or c above, complete the remainder of this checklist			
420.D.2	Does the transporter mix hazardous wastes of differ shipping descriptions by placing them into a single container or tank? (If yes, complete large quantity generator checklist). E: This does not apply to CESQG waste-they are exempt from generator requirements in all cases!			
420.E 420.F 420.G.	Does the transporter have a currently valid Virginia Hazardous Waste Transporter permit? Permit Number: _____ Permit Expiration date: _____			

PART/ SECTIO N	REGULATION	YES	NO	P/V
	kg of hazardous waste in a calendar month pursuan a reclamation agreement? If yes,			
	a. Is the following information contained on a lo shipping paper for each shipment:			
	- the name, address and EPA Identification nu of the generator of the waste?			
	- the quantity of waste accepted?			
	- all DOT required shipping information?			
	b. Does the transporter carry this record when transporting the waste to the reclamation facil			
	- the date the waste is accepted?			
	c. Does the transporter retain these records for a least three years?			
480.H & 480.I	Has the transporter delivered shipments of hazardous waste only to storage, treatment, disposal, or other facilities permitted by the state in which the facility located or to facilities permitted by the EPA or whi qualify for interim status?			
490.C	Has the transporter had a hazardous waste spill wh involved any of the following:			
	a. A person being killed;			
	b. A person receiving injuries requiring hospitaliza			
	c. Estimated carrier or other property damage exceeding $50,000;			
	d. Fire, breakage, spillage or suspected radioactiv contamination resulting from a spill of radioact material;			
	e. A situation which is deemed by the transporte otherwise cause danger to life?			
	If yes to any of the above:			

PART/ SECTION	REGULATION	YES	NO	P/V
490.C.1 & 490.C.2	- Did the transporter give notice at the earliest practicable moment to the national response center, U.S. Coast Guard and the Department Emergency Services? (In case of a spill affec State waters, notice shall also be given to th DEQ Water Division PREP team.			
490.C.4	- Was a written report filed with the Departmer within 15 calendar days of the spill?			
490.E	Has the transporter had a hazardous waste spill fro fixed facility (e.g. transfer facility) which required notification to the National Response Center? If ye did the transporter notify the Chief Administrative O of the local government of the jurisdiction in which release occurred?			
500	Has the transporter stored hazardous waste in conta or tanks for greater than ten days at the transfer facility? (If yes, fill out Unpermitted facility checklist)			
279	Does the transporter act as a marketer of used oil burned for energy recovery? (If yes, complete the oil burned for energy recovery checklist)			

Comments:

NOTE: A MARK IN THE "P/V" COLUMN INDICATES A POTENTIAL VIOLATION

IF A QUESTION IS NOT APPLICABLE, INDICATE "N/A" ACROSS THE COLUMNS