



## Hazardous Waste Small Quantity Generator Checklist

Facility Name

EPA ID NUMBER

DEQ Representative(s)

Date

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
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)(1)]				
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 <b>2. General Facility Checklist.</b> [262.34(d)-(f) and 265.201]				
<b>PRE-TRANSPORT REQUIREMENTS</b>				
3. Does the generator have an internal communication or alarm system capable of providing immediate emergency instruction to facility personnel? [265.32(a) ref. 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(b) ref. by 262.34(d)(4)]				
5. Does the facility have portable fire extinguishers, fire control equipment, and decontamination equipment? [265.32(c) ref. by 262.34(d)(4)]				
6. Is there water at adequate volume and pressure to supply expected fire demands? [265.32(d) ref. 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? [265.33 ref. by 262.34(d)(4)]				
8. Is a log maintained of these inspections?				
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? [265.35 ref. by 262.34(d)(4)]				
10. Has the facility attempted to arrange agreements with the local authorities such that [265.37]:				
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)(1) ref. 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)(2) ref. by 262.34(d)(4)]				
c. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? [265.37(a)(3) ref. by 262.34(d)(4)] And				
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? [265.37(a)(4) ref. by 262.34(d)(4)]				
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? [262.34(d)(5)(i)]				
NAME: _____				
TITLE: _____				



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12. Is the following posted next to the facility telephone [262.34 (d)(5)(ii)]:				
a. The name and telephone number of the emergency coordinator? [262.34 (d)(5)(ii)(A)]				
b. The location of fire extinguishers and spill control material; and if present, the location of the fire alarm? [262.34 (d)(5)(ii)(B)] And				
c. The telephone number of the fire department (if no direct fire alarm)? [262.34 (d)(5)(ii)(C)]				
13. Does the small quantity generator use a manifest to ship wastes off-site? [262.20(a), 262.20(e)] If NO, go to question # 18. If YES, continue.				
14. Has the generator determined that the facility has an EPA ID number? [262.12(c)] (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.)				
15. Has the generator determined that the transporter has a valid EPA identification number and a valid Virginia Transporter Permit? 9VAC 20-60-450				
16. Is the following information on the manifest? [262.20 and 262 Appendix]:				
a. The generator's name, mailing address, EPA ID number, and telephone number?				
b. EPA assigned Manifest Tracking Number?				
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				
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."				
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? [262.42(b)]				
18. Does the small quantity generator have his wastes reclaimed under a contract, and use only a shipping paper? [262.20(a), 262.20(e)(1)] If YES,				
a. Are the type of waste and frequency of reclamation shipments specified in the agreement? [262.20(e)(1)(i)]				
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? [262.20 (e)(1)(ii)]				



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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? [262.20 (e)(2)]				
19. Does the generator retain copies of all manifests, test results and waste analyses for at least three years? [262.40(a) and (c) ref. by 262.44(a)]				
20. Does the generator ensure all employees are thoroughly familiar with proper waste handling and emergency procedures? [262.34 (d)(5)(iii)]				
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, and the DEQ.)				
22. Complete <b>4. Containers Checklist</b> for use and management of hazardous waste in containers.				
23. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container? [262.34(a)(2) ref. by 262.34(d)(4)]				
24. Is the container labeled or marked clearly with the words "Hazardous Waste"? [262.34(a)(3) ref. by 262.34(d)(4)]				
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? [262.34(c)(1)] If yes,				
a. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container? 262.34(c)(1)(ii)				
26. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? [262.34(c)(2)] 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 <b>18. Tank Checklist</b> .				
28. Has the generator determined whether the hazardous waste has to be treated before it can be land disposed? If yes, go to the next question. If no, [268.7(a)(1)]				
a. has the generator alternatively chosen to send the waste to a RCRA-permitted hazardous waste treatment facility, where the waste treatment facility will comply with the requirements of 264.13 and 268.7(b)?				
b. has the generator accompanied the initial shipment of waste with a notification to the treatment facility which includes the following information? [268.7(a)(2)]				
(i) EPA Hazardous Waste Number?				
(ii) The manifest number associated with the initial waste shipment?				
(iii) The following statement? "This hazardous waste may or may not be subject to the LDR treatment standards. The treatment facility must make the determination"				
29. If the generator has determined whether the hazardous waste has to be treated before it can be land disposed, 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)(1) and 268.7(a)(2)]				



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30. Did the notification include the following information [268.7(a)(2) and 268.7(a)(4)]:				
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?				
31. Is land disposal of wastes occurring? [268.1(c)] If Yes,				
a. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? [268.1(c)(1)] 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? [268.1(c)(2)] 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? [268.1(c)(3)]				
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. [268.1(e)(1)]				
33. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction? [268.5]				
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? [268.7(a)(5)]				
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? [268.6(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? [268.3(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.) [268.4(a)]				
38. If Yes, complete <b>12. Surface Impoundment Checklist</b> .				
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)]				
40. Did the notification include the following information [268.7(a)(3)(i) and Table 268.7(a)(4)]:				
a. EPA Hazardous Waste Number?				
b. The corresponding treatment standards and all applicable prohibitions?				



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c. The manifest number associated with the shipment of waste? And				
d. Waste analysis date, where available?				
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)(3)(i)				
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)(4)]				
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? [268.7(a)(8)]				
44. Is the generator storing land restricted waste (for one year storage only)? [268.50]				
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? [268.50(a)(1)]				

**COMMENTS:**