



Hazardous Waste Universal Waste Management Checklist

40 CFR 273 and 9 VAC 20-60-273

Facility Name

EPA ID Number

DEQ Representative(s)

Date

1 40 CFR 273 – Subpart A

As observed during this inspection, the facility manages the following as universal wastes:

- spent lead-acid batteries as described in 273.2 and 273.9
- pesticides as described in 273.3 and 273.9
- mercury containing equipment as described in 273.4 and 273.9
- lamps as described in 273.5 and 273.9

2 UNIVERSAL WASTE HANDLER

(a) For the purpose of this inspection, the facility is being evaluated as a:

- Small Quantity Handler of Universal Waste (Part 273 – subpart B)
- Large Quantity Handler of Universal Waste (Part 273 – subpart C)

NOTE: A Small Quantity Handler of Universal Waste may not accumulate more than 5,000 kg (total) universal waste at any time. A Large Quantity Handler of Universal Waste is one that accumulates >5,000 kg (total) universal waste at any time.

	Yes	No	NA	NC
(b) If the facility is a Large Quantity Handler of Universal Waste, has the facility provided notification of universal waste management activities by submitting a EPA Form 8700-12 as required by 273.32?				

3 Batteries – 273.13 (a) and 273.33(a)

	Yes	No	NA	NC
(a) Releases of universal waste:				
Does the facility maintain UW batteries in a container if they show evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?				
Is the container closed, structurally sound, and compatible with the universal waste being stored?				
(b) Does the facility remove electrolyte from the battery? If yes, has the facility made a hazardous waste determination for the electrolyte and managed it appropriately (specify)?				

4 Pesticides - 273.13 (b) and 273.33(b)

	Yes	No	NA	NC
(a) Does the facility manage UW pesticides in a way that prevents leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?				

(b) Does the facility manage universal waste pesticides in one or more of the following containers (check all that are applicable):

- A container that remains closed, structurally sound, and compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions? or
- A container that does not meet the requirements but that is overpacked in a container that does meet the requirements? or
- A tank that meets the requirements of 40 CFR 265 subpart J, except for 265.197 (c), 265.200, and 265.201? or
- A transport vehicle or vessel that is closed, structurally sound, and compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?



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5 Mercury Containing Equipment (MCE) - 273.13 (c) and 273.33(c)	Yes	No	NA	NC
(a) Does the facility manage UW MCE in a way that prevents leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?				
(b) Does the facility manage UW MCE in a container that remains closed, structurally sound, and compatible with the UW MCE, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?				
(c) Does the facility remove mercury-containing ampules from UW MCE?				
(d) If yes, does the facility meet the requirements of 273.13(c)(2) or 273.33(c)(2) for removing the mercury-containing ampules?				
(e) For any clean-up residues from removing mercury-containing ampules, has the facility made a hazardous waste determination?				

6 Lamps - 273.13 (d) and 273.33(d), and 9 VAC 20-60-273 B.3.	Yes	No	NA	NC
(a) Does the facility manage UW lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents?				
(b) Do containers remain closed and lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions?				
(c) Is there evidence of broken lamps?				
(d) Does the facility immediately clean up and place in a container any lamp that is broken?				
(e) Does the generator crush mercury-containing lamps on-site?				
(f) If yes, are the lamps crushed in a mechanical unit specifically designed for such use?				
(1) Is the unit used indoors?				
(2) Is the crusher unit operated to minimize release of mercury to the workplace and the environment in compliance with 29 CFR 1910.1000?				
(3) Does the facility have documentation from the crusher's manufacturer that shows that the unit: <ul style="list-style-type: none"> • Is capable of achieving the OSHA PEL for mercury of 0.10 mg/m³ in indoor ambient air? • Achieves a particle retention rate of 99.97% in the HEPA filter (at a particle diameter of 0.3 microns)? 				
(4) Does the facility have a documented procedure for the operation of the lamp crusher?				
(5) Is an equipment maintenance log maintained at the facility?				
(6) Have the facility's operators been provided training specific to the lamp crushing unit in use?				
(7) Does the facility have documentation of training of their unit operators?				
(8) Is the lamp crusher equipped with containment and filtration to remove mercury-containing vapors and dusts from process air flow?				
(9) Is the drum containing the crushed bulbs closed, not leaking, and in good condition?				
(10) Does the facility transfer crushed lamps from one drum to another?				
(11) For residue, filter media, or other solid waste generated from crushing operations not being reclaimed, has the generator made a hazardous waste determination and managed it accordingly?				



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7 Labeling and marking – 273.14 and 273.34	Yes	No	NA	NC
Does the facility label the UW or UW containers/tanks with one of the following: "Universal Waste – (insert type)" or "Waste (insert type)," or "Used (insert type)"?				

8 Accumulation time limits– 273.15 and 273.35	Yes	No	NA	NC
(a) Does the facility accumulate UW for more than one year?				
(b) If yes, has the facility demonstrated the need to accumulate UW for more than one year to accumulate quantities necessary to facilitate proper recovery, treatment, or disposal?				
(c) Does the facility demonstrate the length of time the UW has been accumulated from the date it becomes a waste or is received from off site by methods under 273.15 (c) or 273.35 (c)?				

9 Employee Training – 273.16 and 273.36	Yes	No	NA	NC
(a) For SQHs, has the facility informed all employees who handle/have responsibility for handling UW? (The information must describe proper handling and emergency procedures specific to the types of UW the facility handles at the facility.)				
(b) For LQHs, has the facility ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures relative to their responsibilities during normal facility operations and emergencies?				

10 Response to Releases – 273.17 and 273.37	Yes	No	NA	NC
(a) Does the facility contain a release of UW or residue from UW immediately?				
(b) Does the facility make a HW determination on the released and/or residual material?				

11 Off-site shipments – 273.18 and 273.38	Yes	No	NA	NC
(a) Does the facility ship universal waste to another universal waste handler?				
(b) Does the facility ship universal waste to a destination facility?				
(c) Does the facility ship universal waste to a destination facility that recycles it without storing it?				
(d) Does the facility ship universal waste to a foreign destination?				
(e) Does the facility self transport universal waste?				
(f) If yes, has the facility notified if also a LQHUW?				

12 Tracking universal waste shipments – LQHUW – 273.39	Yes	No	NA	NC
(a) Does the LQHUW keep a record of each shipment of universal waste received at the facility? (Record must include name, address, quantity and type of UW, and date)				
(b) Does the LQHUW keep a record of each shipment of universal waste sent off site? (Record must include name, address, quantity and type of UW, and date)				
(c) Does the LQHUW maintain shipping records for at least three years?				



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13 UNIVERSAL WASTE TRANSPORTERS – 40 CFR 273 Subpart D	Yes	No	NA	NC
(a) Does the facility transport universal waste?				
(b) Does the transporter dispose of, dilute or treat universal waste?				
(c) Does the transporter comply with applicable U.S. DOT requirements?				
(d) Does the transporter store the universal waste at a transfer facility for more than ten days?				
(e) Does the transporter contain a release of UW or residue from UW immediately? Does the transporter make a HW determination on the released and/or residual material?				

14 UNIVERSAL WASTE DESTINATION FACILITIES – 40 CFR 273 Subpart E	Yes	No	NA	NC
(a) Does the facility receive universal waste for treatment, disposal or recycling?				
(b) Does the facility comply with applicable requirements of 40 CFR 264, 265, 266, 268, 270, and 124?				
(c) Does the facility recycle universal waste without storing it? (If so, how is this accomplished? Can they demonstrate a market for the recyclables? 40 CFR 261.6(f))				
(d) If so, does the facility comply with 40 CFR 261.6(c)(2)? (261.6(c)(2) - the facility has an EPA ID number and complies with the air emissions requirements in 40 CFR 264 or 265)				
(e) Does the facility have an EPA ID number?				
(f) Does the facility keep a record of each shipment of universal waste received at the facility? (Record must include name, address, quantity and type of UW, and date)				
(g) Does the facility maintain records for at least three years?				
(h) Does the facility send UW they receive to a UW handler, another destination facility, or export it?				
(i) Has the facility had to reject a shipment of UW? If yes, did the facility contact the shipper and discuss reshipment of the load properly – back to the shipper or to another destination facility?				
(j) Has the facility received a shipment of HW that was not UW? If yes, did the facility contact the DEQ with the shipper's name, address, and phone number properly?				

COMMENTS: