

# Hazardous Waste Large Quantity Generator Checklist

Facility Name	EPA ID NUMBER
DEQ Representative(s)	Date

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
SECTION A – MANIFEST				
Does generator ship waste off-site? [262.20]				
2. Does generator use manifest? [262.20]				
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. [262.20(e)]				
If yes, does generator indicate this when sending waste to a TSD facility?				
b. If yes, does manifest include the following information? [Part 262 Appendix]				
1. Manifest tracking no.				
2. Generator's name, mailing address, telephone no and site address.				
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.				$\overline{\Box}$
7. Instructions to return to generator if undeliverable		$\overline{\Box}$	$\overline{\Box}$	$\overline{\Box}$
8. Waste information required by DOT – shipping name, quantity (weight or vol.),		$\overline{\Box}$	$\overline{\Box}$	$\overline{\Box}$
containers (type and number) and waste codes,		_	_	
9. Emergency information (optional) (special handling instructions, telephone no.)				
10. Is the following certification on each manifest form?  "GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent."				
11. Does generator retain copies of manifests? [262.40]				
If yes, complete a through g. [262.23]				
a. Did generator sign and date all manifests?				
<ul><li>b. Did generator obtain handwritten signature and date of acceptance from initial transporter?</li></ul>				
c. Does generator retain one copy of manifest signed by generator and initial transporter? [262.40]				
<ul> <li>d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? [262.40]</li> </ul>				
12. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago? [262.42]				
a. If no, has the generator filed an exception report?				
b. Does the exception report include:				
<ol> <li>a legible copy of the manifest for which the generator does not have confirmation of the delivery? and</li> </ol>				

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2. a cover letter explaining the efforts taken to locate the shipment?				
SECTION B – HAZARDOUS WASTE DETERMINATION [262.11]	1			
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)?				
5. Has the generator evaluated all solid wastes to determine whether the solid wastes are hazardous wastes?				
SECTION C – PRETRANSPORT REQUIREMENTS				
6. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? [262.30]				
a. Are containers to be shipped leaking or corroding?		П	П	П
b. Complete Checklist 4. Containers to evaluate condition of containers.				
c. Is there evidence of heat generation from incompatible wastes in the containers?				
7. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? 262.31				
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? 262.32  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.				
10. Does generator have placards to offer to transporters? [262.33]				
11. Accumulation time? [262.34]				
a. Are containers used to temporarily store waste before transport?				
1. If yes, is each container clearly dated. 262.34(a)(2)				<u> </u>
2. If yes, is each container labeled or clearly marked with the words "Hazardous Waste?" [262.34(a)(3)]				
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? [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)]				
13. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? [262.34(c)(1)] 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 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?				
SECTION D – RECORDKEEPING AND RECORDS 262.40				
14. Does generator keep the following reports for 3 years:				

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REGULATION [40 CFR CITATION]	YES	NO	NA	NC
a. Manifest or signed copies from designated facilities?				
b. Biennial reports?				
c. Exception reports?				
d. Test results?				
15. Where are the records kept (at facility or elsewhere)?				
SECTION E – SPECIAL CONDITIONS				
16. Has the primary exporter received from or transported to a foreign source any hazardous waste?				
a. If yes, has he filed a notice with the Regional Administrator? [262.53]				
b. Is this waste manifested and signed by a foreign consignee? [262.54]				
<ul> <li>c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? [262.54]</li> </ul>				
SECTION F – LDR REQUIREMENTS [268]				
17. Has the generator determined whether the hazardous waste has to be treated before it can be land disposed? [268.7(a)(1)] If yes, go to the next question. If no,				
a. has the generators 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?"				
18. If the generator has determined whether the hazardous waste has to be treated before it can be land disposed. 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)(1) and 268.7(a)(2)]				
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?				
20. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction? [268.5]				
21. 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]				
22. 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]				

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REGULATION [40 CFR CITATION]	YES	NO	NA	NC
23. 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]				
24. If yes, complete Check Sheet 12. Surface Impoundments.				
25. Is the facility treating waste in Tanks or Containers in order to meet applicable treatment standards under 268.40?				
26. If Yes, has the facility developed a Waste Analysis Plan? [268.7(a)(4) ]				
27. Has the Waste Analysis Plan been filed with the Director a minimum of 30 days prior to the treatment activity? [268.7(a)(4)(ii)]				
28. Restricted wastes, for which the generator is managing and 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? [268.7(a)(1)]				
29. Did the notification include the following information:				
a. EPA Hazardous Waste Number? [268.7(a)(1)(i)]				
b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents? [268.7(a)(1)(ii)]				
c. The manifest number associated with the shipment of waste? [268.7(a)(1)(iii)] and				
d. Waste analysis data, where available? [268.7(a)(1)(v)]				
30. 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)? 268.7(a)(2)				
31. Did the notification include the following information:				
a. EPA Hazardous Waste Number? [268.7(a)(2)(i)(A)]				
b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents? [268.7 (a)(2)(i)(B)]				
c. The manifest number associated with the shipment of waste? [268.7(a)(2)(i)(C)] And				
d. Waste analysis date, where available? [268.7(a)(2)(i)(D)]				
32. 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)(2)(ii)]				
33. 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)(3)]	;			
34. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, 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)(7)]				
35. Is the generator storing land restricted waste? (For one year storage only)				

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REGULATION [40 CFR CITATION]	YES	NO	NA	NC
36. 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:** 

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