



HAZARDOUS WASTE CONTAINER MANAGEMENT CHECKLIST

REVISED FEBRUARY 2021

Facility Name		EPA ID Number	
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DEQ Representative(s)		Date	
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NOTE: Regulatory citations herein for Large Quantity Generators (1000 kg or greater) are as referenced by 40 CFR 262.17. Regulatory citations herein for Small Quantity Generators (>100 kg – <1000 kg) are as referenced by 40 CFR 262.16.

SECTION A - HAZARDOUS WASTE ACCUMULATION AREAS

1. List each container accumulation area. Specify the number, volume, and/or quantity/weight of each container type. [NOTE: Include any satellite accumulation areas and verify compliance with satellite accumulation requirements. Provide comments if observations indicate non-compliance.]		
LOCATION	NUMBER/SIZE OF CONTAINER	CONTENTS

NA = Not Applicable; NC = Not Compliant

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
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SECTION B – SATELLITE ACCUMULATION AREAS FOR SQGs and LQGs

2. Does the generator have satellite accumulation areas where up to 55 gallons of any one type of hazardous waste (HW) (and/or < 1qt acutely HW) are accumulated? [262.15 (a)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are all satellite areas located at or near the point of generation? [262.15(a), 262.15(a)(6)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are the satellite area containers marked with the words “Hazardous Waste”? [262.15 (a)(5)(i)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If yes, do the satellite area containers provide an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704)? [262.15 (a)(5)(ii)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? [262.15(a)(6)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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REGULATION [40 CFR CITATION]	YES	NO	NA	NC
a. If yes, has the generator marked the excess amount with the date the excess amount began accumulating? [262.15(a)(6)(iii)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If no, has the generator removed the excess from the satellite accumulation area within three consecutive calendar days to either a central accumulation area, an on-site interim status or permitted treatment, storage or disposal facility, or an off-site designated facility? [262.15(a)(6)(i)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. If no, 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? [262.15(a)(6)(i) and (ii)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. For all satellite accumulation areas, has the generator met meet the preparedness and prevention regulations of §262.16(b)(8) and emergency procedures at §262.16(b)(9) for SQGs, or at Subpart M for LQGs? [262.15(a)(7), 262.15(a)(8)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Is the container(s) holding hazardous waste in the satellite accumulation area closed at all times during accumulation, except (i) When adding, removing, or consolidating waste; or (ii) When temporary venting of a container is necessary; (A) For the proper operation of equipment, or (B) To prevent dangerous situations, such as build-up of extreme pressure. [262.15 (a)(4)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Has the generator met the special standards for incompatible wastes for hazardous wastes accumulated in satellite accumulation areas? [262.15(a)(3)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Have incompatible wastes, or incompatible wastes and materials, (see appendix V of part 265 for examples) been placed in the same container, unless §265.17(b) of this chapter is complied with? [262.15(a)(3)(i)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Have hazardous waste been placed in an unwashed container that previously held an incompatible waste or material (see appendix V of part 265 for examples), unless §265.17(b) of this chapter is complied with? [262.15(a)(3)(ii)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Has a container holding a hazardous waste that is incompatible with any waste or other materials accumulated nearby in other containers been separated from the other materials or protected from them by any practical means? [262.15(a)(3)(iii)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Has it been observed if a container holding hazardous waste that is not in good condition, or if it begins to leak, that the generator immediately transferred the hazardous waste from the poorly conditioned or leaking container to a container that is in good condition, or immediately transferred and managed the waste in a central accumulation area operated in compliance with §262.16(b) or §262.17(a) . [262.15(a)(1)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION C – CONTAINER MANAGEMENT - FOR CONTAINERS IN CENTRAL ACCUMULATION AREAS

13. Are all containers in good condition and not leaking? [262.15 (a)(1)], [262.16 (b)(2)(i)], [262.17 (a)(1)(ii)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Are all containers made of materials that will not react with the waste they contain? [262.15 (a)(2)], [262.16 (b)(2)(ii)], [262.17 (a)(1)(iii)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Are all containers kept closed while hazardous waste is in accumulation? [262.15 (a)(4)], [262.16 (b)(2)(iii)(A)], 262.17 (a)(1)(iv)(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If no, are the containers being temporarily vented as necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Is the container never opened, handled, or stored in a manner which may rupture it or cause it to leak? [262.16 (b)(2)(iii)(B)], 262.17 (a)(1)(iv)(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Is each container clearly dated? [262.17(a)(5)(C)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Are all containers marked or labeled with the words "Hazardous Waste"? [262.15(a)(5)(i)], 262.16(ii)(6)(i)(A), 262.17(a)(5)(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. Are all containers marked or labeled with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704). [262.15(a)(5)(ii), 262.16(b)(6)(B), 262.17(a)(5)(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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REGULATION [40 CFR CITATION]	YES	NO	NA	NC
20. Does the owner/operator inspect containers at least weekly for leaks and deterioration? [262.16 (b)(2)(iv)], [262.17 (a)(1)(v)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If yes, are these weekly inspections documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. For LQGs and TSDs, are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines? [262.17(a)(1)(vi)], [265.176],	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If no, has the LQG or TSD petitioned the local authority having jurisdiction (AHJ) to store ignitable hazardous waste less than fifty feet from the facility property line?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Are incompatible wastes or materials placed in the same containers? [262.15(a)(3)(i)], [262.16 (b)(2)(v)(A)], [262.17 (a)(1)(vii)(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
23. Are hazardous wastes placed in washed, clean containers if the containers previously held incompatible product or waste? [262.15 (a)(3)(ii)], [262.16(b)(2)(v)(B)], [262.17(a)(1)(vii)(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24. Has the generator used a container made of or lined with materials that will not react with, and are otherwise compatible with, the hazardous waste to be accumulated, so that the ability of the container to contain the waste is not impaired? [262.15(a)(2)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
25. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device? [262.15 (a)(3)(iii)], [262.16(b)(2)(v)(C)], [262.17(a)(1)(vii)(C)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION D – PRETRANSPORT REQUIREMENTS FOR SQGS AND LQGS– IF THE INSPECTOR DOES NOT OBSERVE CONTAINERS READY TO BE TRANSPORTED, DO NOT COMPLETE THIS SECTION

26. Does generator package waste in containers in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? [262.30]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. Are containers to be shipped leaking or corroding?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Is there evidence of heat generation from incompatible wastes in the containers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
27. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? [262.31]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
28. Does generator mark each package in accordance with 49 CFR 172? [262.32]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
29. Is each container of 110 gallons or less marked with a label containing the following information? [262.32]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. The words: "HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency."	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generator name(s) and address(es)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Generator EPA Identification Number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Manifest document No.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. EPA Hazardous Waste Nos./waste codes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
30. Does the generator use a nationally recognized electronic system, such as bar coding, to identify the EPA Hazardous Waste Number(s), as required by paragraph (b)(5) or paragraph (d) of 262.32?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
31. Does generator have placards to offer to transporters? [262.33]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION E – LQG CONTAINER REQUIREMENTS – NOTIFICATION AND CLOSURE

32. Has the LQG notified the Department of the exact location of his <90 day hazardous waste central accumulation areas prior to or upon establishment of the areas (9 VAC 20-60-262 B.4.)? Note: Provided that no new accumulation areas have been established since the previous inspection, previous inspection reports indicating existing and continued use should qualify as adequate notification.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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CONTAINER MANAGEMENT CHECKLIST

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
Note: Small Quantity Generators are not required to make this notification. Satellite Accumulation Areas are not included in this notification requirement.				
33. For any hazardous waste central accumulation areas that the LQG has stopped using, has the LQG placed a notification in the facility operating record within thirty days after closure of the unit? [262.17(a)(8)(i)(A)], OR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
34. For any hazardous waste central accumulation areas that the LQG has stopped using, has the LQG notified DEQ within thirty days that the CAA is no longer being used? [262.17(a)(8)(i)(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
35. Has the LQG met the closure performance standard for the closed container area? [262.17(a)(8)(i)(B), 262.17(a)(8)(iii)] and notified DEQ as per 262(a)(8)(ii)(B)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION F – SUBPART CC – AIR EMISSION STANDARDS FOR CONTAINERS

[Note: This section applies to LQGs [262.17 (a)(1)(i)] and TSDs. SQGs are exempt per 262.16

Subpart CC applies to containers holding HW with an average volatile organic concentration > 500 ppmw.	
Compliance Level One	Containers > 26.4 gal but ≤ 119 gal, must meet DOT standards; must use cover and closure device with no gaps, or use vapor suppressing barrier.
Compliance 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.
Compliance Level Three	Containers used for waste treatment by stabilization - Must vent vapors from containers and remove or destroy the vapors in a control device; or put container in an enclosure and vent vapors and destroy them in a control device.

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
36. Does the facility generate hazardous waste with >500 ppmw VOCs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If yes, does the facility claim that the subpart CC regulations are not applicable to their Containers or that the units are excepted or exempted from regulation (265.1080(b), 265.1083(c), or 265.1)? Explain in the comments section. [265.1080]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If the containers are exempt because the volatile organic compound (VOC) concentration of the waste is <500 ppmw, does the facility have VOC determination records? [265.1084]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. What level of emission control is the facility using to comply with Subpart CC container requirements? (describe)				

SECTION G – PERMITTED AND UNPERMITTED TSD CONTAINER FACILITY REQUIREMENTS

37. Do container storage areas have a containment system? [264.175]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
38. At closure, were all hazardous wastes and associated residues removed from the containment system? [264.178]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS: