



# HAZARDOUS WASTE SMALL QUANTITY GENERATOR CHECKLIST

REVISED FEBRUARY 2021

Facility Name		EPA ID Number	
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DEQ Representative(s)		Date	
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NA = Not Applicable; NC = Not Compliant

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
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### SECTION A – GENERATOR STATUS

1. Does the generator ever accumulate a quantity of hazardous waste greater than 6,000 kilograms? If YES, then use <b>Large Quantity Generator</b> or <b>Unauthorized Facility Checklist</b> , whichever is applicable <b>[262.16(b)(1)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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>General Facility Checklist</b> . <b>[262.16 (b)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### SECTION B – EMERGENCY EQUIPMENT

3. Does the generator have an internal communication or alarm system capable of providing immediate emergency instruction to facility personnel? <b>[262.16(b)(8)(ii)(A)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Does the generator have a device such as a telephone (immediately available at the scene of operations) or two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or Commonwealth or local emergency response teams? <b>[262.16(b)(8)(ii)(B)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Does the facility have portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? <b>[262.16(b)(8)(ii)(C)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Is there water at adequate volume and pressure to supply expected fire demands? <b>[262.16(b)(8)(ii)(D)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Does the facility test and maintain the equipment in the previous four questions as necessary to assure proper operation? <b>[262.16(b)(8)(iii)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Do all personnel involved in hazardous waste being poured, mixed, spread, or otherwise handled have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, <i>unless</i> such a device is not required under paragraph (a)(8)(ii) of this section. <b>[262.16(b)(8)(iv)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. In the event there is just one employee on the premises while the facility is operating, does the employee have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance, <i>unless</i> such a device is not required under paragraph (a)(8)(ii) of this section. <b>[262.16(b)(8)(iv)(B)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### SECTION C – FACILITY REQUIREMENTS

10. Does the generator operate and maintain its facility to minimize the possibility of fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents to the air, soil or surface water which could threaten human health and the environment? <b>[262.16 (b)(8)(i)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. 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? <b>[262.16 (b)(8)(v)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Has the facility attempted to arrange agreements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals taking into account the types and quantities of hazardous waste handled at the facility? <b>[262.16 (b)(8)(vi)]</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
a. Did the small quantity generator attempt to make arrangements with its local fire department and determine the need for the services of the local police department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals? <b>[262.16 (b)(8)(vi)(A)(1)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Did the small quantity generator attempt to make arrangements, as necessary, to familiarize the above organizations with the layout of the facility, the properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes as well as the types of injuries or illnesses that could result from fires, explosions, or releases at the facility? <b>[262.16 (b)(8)(vi)(A)(2)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Where more than one police and fire department might respond to an emergency, did the small quantity generator attempt to make arrangements designating primary emergency authority to a specific fire or police department, and arrangements with any others to provide support to the primary emergency authority? <b>[262.16 (b)(8)(vi)(A)(3)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Does the small quantity generator maintain records documenting the arrangements with the local fire department as well as any other organizations necessary to respond in an emergency? <b>[262.16 (b)(8)(vi)(A)(3)(B)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. 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? <b>[262.16 (b)(9)(i)]</b>  NAME: _____  TITLE: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Is the following posted next to facility telephones?: <b>[262.16 (b)(9)(ii)]</b>				
a. The name and telephone number of the emergency coordinator? <b>[262.16 (b)(9)(ii)(A)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. The location of fire extinguishers and spill control material; and if present, the location of the fire alarm? <b>[262.16 (b)(9)(ii)(B)]</b> And	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. The telephone number of the fire department (if no direct fire alarm)? <b>[262.16 (b)(9)(ii)(C)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Has the SQG experienced a spill that required containment and cleanup? <b>[262.16(b)(9)(iv)(B)]</b>				
a. Did the spill reach surface water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Has the SQG experienced a fire, explosion, or other release that could threaten human health outside the facility? <b>[261.16(b)(9)(iv)(C)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. If SQG answered yes to 15a or 16, did the SQG immediately notify the National Response Center? <b>[261.16(b)(9)(iv)(C)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### SECTION D – MANIFEST REQUIREMENTS

18. Does the small quantity generator use a manifest to ship wastes off-site? <b>[262.20(a), 262.20(e)]</b> If NO, go to question #23. If YES, continue.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. Has the generator determined that the facility has an EPA ID number? <b>[262.12(c)]</b> (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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Has the generator determined that the transporter has an EPA identification number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Is the following information on the manifest? <b>[262.20 and 262 Appendix]:</b>				
a. The generator's name, mailing address, EPA ID number, and telephone number?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Manifest Tracking Number?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. The total number of pages of the manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. The company name and EPA ID number of each transporter used?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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e. The company name, site address, and EPA ID number of the facility designated to receive the waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. The quantities of waste being shipped? and	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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."	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. 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? <b>[262.42(b)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
23. Does the small quantity generator have his wastes reclaimed under a contract, and use only a shipping paper? <b>[262.20(e)(1)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If yes, are the type of waste and frequency of reclamation shipments specified in the agreement? <b>[262.20(e)(1)(i)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If yes, 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? <b>[262.20 (e)(1)(ii)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. If yes, 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? <b>[262.20 (e)(2)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24. Does the generator retain copies of all manifests, test results and waste analyses for at least three years? <b>[262.44(a)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### SECTION E - TRAINING

25. Does the small quantity generator ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? <b>[262.16(b)(9)(iii)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
26. Is documentation of this training maintained?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### SECTION F – HAZARDOUS WASTE MANAGEMENT UNITS

27. Does the small quantity generator accumulate hazardous waste in:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. Containers? Complete <b>Container Checklist</b> .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Tanks? Complete <b>SQG Tank Checklist</b> .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Containment Buildings? Complete <b>Containment Building Checklist</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Drip pads? Complete <b>Drip Pad Checklist</b> .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### SECTION G – LAND DISPOSAL RESTRICTIONS

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, <b>[268.7(a)(1)]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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REGULATION [40 CFR CITATION]	YES	NO	NA	NC
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)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i) EPA Hazardous Waste Number?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) The manifest number associated with the initial waste shipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(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"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
30. Did the notification include the following information [268.7(a)(2) and 268.7(a)(4)]:				
a. EPA Hazardous Waste Number?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. The corresponding treatment standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. The manifest number associated with the shipment of waste? And	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Waste analysis data, when available?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
31. Is land disposal of wastes occurring? [268.1(c)] If Yes,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
32. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction? [268.5]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
33. Is the SQG treating waste in Tanks or Containers in order to meet applicable treatment standards under 268.40? [268.7(a)(5)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If yes, has the SQG developed a Waste Analysis Plan? [268.7(a)(5)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
34. 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)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
35. 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)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
36. 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)]. If yes, complete <b>Surface Impoundment Checklist</b> .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
37. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied the initial shipment of each 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)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
38. Did the notification include the following information [268.7(a)(3)(i) and Table 268.7(a)(4)]:				
a. EPA Hazardous Waste Number?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. The corresponding treatment standards and all applicable prohibitions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. The manifest number associated with the shipment of waste? And	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Waste analysis date, where available?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## SMALL QUANTITY GENERATOR CHECKLIST

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
e. 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
39. 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)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
40. 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)(8)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
41. Is the generator storing land restricted waste (for one year storage only)? [268.50]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
42. 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 and does the generator comply with the requirements in 262.16 and 262.17 and parts 264 and 265 of this chapter? [268.50(a)(1)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### SECTION H – RECORDKEEPING AND REPORTING

43. Does the generator keep the following reports for 3 years:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. Inspection Logs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exception Reports	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Test Results	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
44. Where are the records kept (at the facility or elsewhere)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**COMMENTS:**