



UNIVERSAL WASTE CHECKLIST

REVISED JANUARY 2023

Facility Name		EPA ID Number	
DEQ Representative(s)		Date	

SECTION A – GENERAL [40 CFR 273 – Subpart A]

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

- 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

- Aerosol Cans as described in 273.6 and 273.9.

2. 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.

NA = Not Applicable; NC = Not Compliant

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
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SECTION B - UNIVERSAL WASTE HANDLER [273.32]

3. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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SECTION C - BATTERIES [273.13(a) and 273.33(a)]

4. Releases of universal waste:				
a. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Is the container closed, structurally sound, and compatible with the universal waste being stored?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION D – PESTICIDES [273.13(b) and 273.33(b)]

6. Does the facility manage UW pesticides in a way that prevents leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Does the facility manage universal waste pesticides in one or more of the following containers (check all that are applicable):				
a. 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A container that does not meet the requirements but that is overpacked in a container that does meet the requirements? or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A tank that meets the requirements of 40 CFR 265 subpart J, except for 265.197 (c), 265.200, and 265.201? or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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REGULATION [40 CFR CITATION]	YES	NO	NA	NC
d. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION E – MERCURY CONTAINING EQUIPMENT [273.13 (c) and 273.33(c)]

8. Does the facility manage UW MCE in a way that prevents leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Does the facility remove mercury-containing ampules from UW MCE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. If yes, does the facility meet the requirements of 273.13(c)(2) or 273.33(c)(2) for removing the mercury-containing ampules?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. For any clean-up residues from removing mercury-containing ampules, has the facility made a hazardous waste determination?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION F – LAMPS [273.13(d) and 273.33(d), and 9 VAC 20-60-273 B.3]

13. Does the facility manage UW lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Do containers remain closed and lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Is there evidence of broken lamps?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Does the facility immediately clean up and place in a container any lamp that is broken?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Does the generator crush mercury-containing lamps on-site? If yes, complete Lamp Crushing Checklist for management of crushing universal waste lamps.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION G – AEROSOL CANS [273.13(e) and 273.33(e) and 273.6]

18. Does the facility manage UW aerosol cans in a way that prevents releases of any universal waste or component to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. Does the facility accumulate aerosol cans in a container that is structurally sound, compatible with the contents, and that lacks evidence of leakage, spillage, or damage that could cause leakage, and is protected from sources of heat?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Have any universal waste aerosol cans that show evidence of leakage been packaged in a separate closed container or overpacked with absorbents, or immediately punctured and drained in accordance with 40 CFR 273.13(e)(4)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Is the SQH of UW sorting aerosol cans by type, mixing intact cans in a single container, and/or removing actuators to reduce the risk of accidental release?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Is the generator puncturing and draining its aerosol cans?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If yes, does the generator conduct puncturing and draining activities using a device specifically designed to safely puncture aerosol cans and effectively contain the residual contents and any emissions thereof?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If yes, does the generator establish and follow a written procedure detailing how to safely puncture and drain the universal waste aerosol cans, maintain a copy of the manufacturer's specifications for the puncturing device, and ensure employees operating the device are trained in the proper procedures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. If yes, does the generator ensure that the puncturing of the can is done in a manner designed to prevent fires and to prevent the release of any component of universal waste to the environment, including locating the equipment on a solid flat surface in a well-ventilated area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. If yes, does the generator immediately transfer the contents from the waste aerosol can or puncturing device to a container or tank that meets the requirements of the container and tank checklists found in 262.24, 262.15, 262.16 and 262.17?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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e. If yes, does the generator conduct a hazardous waste determination on the contents of the emptied aerosol can(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. If yes, does the generator that punctures have a written procedure in place in the event of a spill or leak?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. If yes, does the generator provide a spill clean-up kit, and have all spills been cleaned up promptly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION h – LABELING AND MARKING [273.14 and 273.34]

23. 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)"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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SECTION I – ACCUMULATION TIME LIMITS [273.15 and 273.35]

24. Does the facility accumulate UW for more than one year?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
25. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
26. 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION J – EMPLOYEE TRAINING [273.16 and 273.36]

27. 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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
28. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION K – RESPONSE TO RELEASES [273.17 and 273.37]

29. Does the facility contain a release of UW or residue from UW immediately?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
30. Does the facility make a HW determination on the released and/or residual material?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION L – OFF-SITE SHIPMENTS [273.18 and 273.38]

31. Does the facility ship universal waste to another universal waste handler?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
32. Does the facility ship universal waste to a destination facility?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
33. Does the facility ship universal waste to a destination facility that recycles it without storing it?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
34. Does the facility ship universal waste to a foreign destination?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
35. Does the facility self-transport universal waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If yes, has the facility notified if also a LQHUW?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION M – LQHUU [273.39]

31. Does the LQHUU 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
32. Does the LQHUU keep a record of each shipment of universal waste sent off site? (Record must include name, address, quantity and type of UW, and date)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
33. Does the LQHUU maintain shipping records for at least three years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION N - UNIVERSAL WASTE TRANSPORTERS [273 Subpart D]

34. Does the facility transport universal waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
35. Does the transporter dispose of, dilute or treat universal waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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REGULATION [40 CFR CITATION]	YES	NO	NA	NC
36. Does the transporter comply with applicable U.S. DOT requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
37. Does the transporter store the universal waste at a transfer facility for more than ten days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
38. Does the transporter contain a release of UW or residue from UW immediately?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
39. Does the transporter make a HW determination on the released and/or residual material?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION O -UNIVERSAL WASTE DESTINATION FACILITIES [273 Subpart E]

40. Does the facility receive universal waste for treatment, disposal or recycling?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
41. Does the facility comply with applicable requirements of 40 CFR 264, 265, 266, 268, 270, and 124?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
42. Does the facility recycle universal waste without storing it?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If yes, how is this accomplished? <u>Comment:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Can they demonstrate a market for the recyclables? [261.6(f)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. If yes, does the facility have an EPA ID number and comply with the air emissions requirements in 40 CFR 264 or 265)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
43. 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
44. Does the facility maintain records for at least three years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
45. Does the facility send UW they receive to a UW handler, another destination facility, or export it?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
46. Has the facility had to reject a shipment of UW?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If yes, did the facility contact the shipper and discuss reshipment of the load properly – back to the shipper or to another destination facility?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
47. Has the facility received a shipment of HW that was not UW?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If yes, did the facility contact the DEQ with the shipper's name, address, and phone number properly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS: