

Small Quantity Generator (SQG) Hazardous Waste Checklist

Purpose and Explanation:

The following is a general summary of requirements that could apply to a Small Quantity Hazardous Waste Generator (generate between 220 and 2,200 lb/mo hazardous waste, and store less than 13,200 lb total). The regulatory citations should be consulted for more specific information on individual requirements, as this summary is very generalized and not intended to encompass all aspects of hazardous waste regulations.

General Information

Site EPA ID #:

Address:

Telephone Number:

Facility Representatives/Titles:

Inspectors Certification:

1 Signature: _____ Title: _____

2 Signature: _____ Title: _____

Inspection Date:

HAZARDOUS WASTE REGULATORY COMPLIANCE GENERATOR REQUIREMENT CITATION(S)

IC = In Compliance

OC = Out of Compliance

Note = Reference at end of each section

HAZARDOUS WASTE GENERATOR REQUIREMENTS			
<i>RECORDKEEPING AND REPORTING REQUIREMENTS</i>			
Item / Regulatory Citation	IC	OC	Note
EPA Identification Number 40 CFR § 262.12(a)			
Retain HW manifests (3 yrs) 40 CFR § 262.40(a)			
Retain LDR notices (3 yrs) 40 CFR § 268.7(a)(8)			
Retain waste determination data (3 yrs) 40 CFR § 262.40(c)			

ACCUMULATION LIMITS			
Item / Regulatory Citation	IC	OC	Note
On-site storage for < 180 days 40 CFR § 262.34(d)			
On-site storage < 270 days (if transporting > 200 miles) 40 CFR § 262.34(e)			
Storage of less than 13,200 lbs 40 CFR § 262.34(d)(1)			

WASTE IDENTIFICATION REQUIREMENTS			
Item / Regulatory Citation	IC	OC	Note
Hazardous waste determination 40 CFR § 262.11(c)(2)			
LDR waste determination 40 CFR § 268.7(a)			
Manifest information correct 40 CFR 262 App. (Manifest Instructions)			

PERSONNEL TRAINING REQUIREMENTS			
Item / Regulatory Citation	IC	OC	Note
Ensure employee awareness of waste handling/emergency procedures 40 CFR § 262.34(d)(5)(iii)			

EMERGENCY MANAGEMENT REQUIREMENTS			
Item / Regulatory Citation	IC	OC	Note
Internal communications/alarms 40 CFR § 262.34(d)(4) 40 CFR § 265.32(a)			
External communications 40 CFR § 262.34(d)(4) 40 CFR § 265.32(b)			
Emergency response equipment 40 CFR § 262.34(d)(4) 40 CFR § 265.32(c), (d)			
Equipment testing 40 CFR § 262.34(d)(4) 40 CFR § 265.33			
Adequate aisle space 40 CFR § 262.34(d)(4) 40 CFR § 265.35			
Arrangements with Local Authorities 40 CFR § 262.34(d)(4) 40 CFR § 265.37(a)			
Designated emergency coordinator, on-site or on-call 40 CFR § 262.34(d)(5)(l)			

Information posted next to telephone: A. Name and telephone number of emergency coordinator B. Location of fire extinguishers, spill equipment, alarms. C. Fire department phone number 40 CFR § 262.34(d)(5)(ii)			
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SHIPPING REQUIREMENTS			
Item / Regulatory Citation	IC	OC	Note
Hazardous Waste Manifest 40 CFR § 262.20(a)			
Land Disposal Restrictions Notification 40 CFR § 268.7			
Exception reporting 40 CFR § 262.42(a)			
Export notification 60 days prior to export 40 CFR § 262.53			

ON-SITE TREATMENT REQUIREMENTS			
Item / Regulatory Citation	IC	OC	Note
Treatment only in tanks or containers 40 CFR § 262.34			
Written Waste Analysis Plan (if treating to meet LDR standards) 40 CFR § 268.7(a)(5)			
Notification of managing waste that is subsequently excluded or exempted 40 CFR 268.7(a)(7)			
Determine all applicable waste codes and underlying constituents 40 CFR § 268.9(a)			
Notification of characteristic HW treatment maintained in files (updated annually or if process changes) 40 CFR § 268.9(d)			

CONTAINER STORAGE REQUIREMENTS			
Item / Regulatory Citation	IC	OC	Note
Marked with Accumulation Start Date 40 CFR § 262.34(d)(4) 40 CFR § 262.34(a)(2)			
Marked with the words "Hazardous Waste" 40 CFR § 262.34(d)(4) 40 CFR § 262.34(a)(3)			
Containers in good condition 40 CFR § 262.34(d)(2) 40 CFR § 265.171			

Containers closed 40 CFR § 262.34(d)(2) 40 CFR § 265.173 (a)			
Weekly inspections 40 CFR § 262.34(d)(2) 40 CFR § 265.174			
Satellite Accumulation - < 55 gallons 40 CFR § 262.34(c)(1)			
S.A. - At or near Point of Generation 40 CFR § 262.34(c)(1)			
S.A. - Under control of operator 40 CFR § 262.34(c)(1)			
S.A. - Removal of waste exceeding 55 gallons within 3 days 40 CFR § 262.34(c)(2)			
S.A. - Marked with container contents 40 CFR § 262.34(c)(1)(ii)			
S.A. - Containers closed 40 CFR § 262.34(c)(1)(i) 40 CFR § 265.173 (a)			

TANK STORAGE REQUIREMENTS			
Item / Regulatory Citation	IC	OC	Note
Marked with the words "Hazardous Waste" 40 CFR § 262.34(d)(4) 40 CFR § 262.34(a)(3)			
2 feet freeboard or containment structure(uncovered tanks) 40 CFR § 262.34(d)(3) 40 CFR § 265.201(b)(3)			
Waste feed cutoff system or bypass 40 CFR § 262.34(d)(3) 40 CFR § 265.201(b)(4)			
Daily inspections of discharge equipment, monitoring equipment, waste levels 40 CFR § 262.34(d)(3) 40 CFR § 265.201(c)(1) - (3)			
Weekly inspections of tank and containment structures 40 CFR § 262.34(d)(3) 40 CFR § 265.201(c)(4) - (5)			
Ignitable storage (protected from sources of ignition and buffer zone) 40 CFR § 265.34(d)(3) 40 CFR § 265.201(e)(1) & (2)			