

**PARTIAL INSPECTION CHECKLIST — HAZARDOUS WASTE GENERATORS**

Inspector(s): \_\_\_\_\_

Date: \_\_\_\_\_ Time Arrived: \_\_\_\_\_

**I. GENERATOR INFORMATION**

Facility Name: \_\_\_\_\_ Location: \_\_\_\_\_

Mailing Address:  see multi-media (mm) checklist // OR: \_\_\_\_\_

Directions:  see mm checklist // OR: \_\_\_\_\_

\_\_\_\_\_ (attach map to front of file)

Contact(s)/Title(s):  see mm checklist // OR: \_\_\_\_\_

Phone N<sup>o</sup>:  see mm checklist // OR: \_\_\_\_\_

Notification filed {§7-104(a)}?  Yes  No Notif. Date: \_\_\_\_\_ Up-to-date {§7-104(c)}?  Yes  No

EPA ID N<sup>o</sup>: VT\_\_-\_\_\_\_-\_\_\_\_-\_\_\_\_ //  Not on RCRIS VT ID N<sup>o</sup>: \_\_-\_\_\_\_-\_\_\_\_-\_\_\_\_ //  none

Approximate number of employees: \_\_\_\_\_ Shifts/day: \_\_\_\_\_ Days/week: \_\_\_\_\_

Does this company have other facilities or affiliates in Vermont?  Yes  No

If yes to above, please list names and locations: \_\_\_\_\_

**II. SITE HISTORY**

Date Current Use Established at this Location: \_\_\_\_\_

Previous site uses/Names of operation since 1980:  N/A, or: \_\_\_\_\_

List known environmental permits, violations or investigations: \_\_\_\_\_

Was there a prior visit by the WMD?  Yes  No If yes: Date: \_\_\_\_\_ Inspector: \_\_\_\_\_

**III. CURRENT PROCESS INFORMATION**

Product(s): \_\_\_\_\_

Primary Processes (e.g.: cutting, grinding); Raw Materials: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Notes: \_\_\_\_\_

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Photos taken, including time, location, and subject: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Generator Status: (Note that actual generator status is subject to verification)

Registered:  CEG  SQG  LQG  not on RCRAInfo

Observed:  CEG  SQG  LQG  non-generator of hazardous waste

Description of Waste Streams Generated On-Site (those marked by \* may be exempt, depending how they are managed):

	Description	Generation Rate (gal or lb/mo)	Disposal/Management Method, Comments {if CEG, per §7-306(c)(2)? Y__ N__ N/A__}
	Dry cleaning solvents/sludges and lint ( <input type="checkbox"/> perc <input type="checkbox"/> stoddard <input type="checkbox"/> CFCs <input type="checkbox"/> _____)		
	Dry clean wastewater; filters ( <input type="checkbox"/> cartridge <input type="checkbox"/> spin disk)		
	Used oils* (stored in: <input type="checkbox"/> containers <input type="checkbox"/> AST <input type="checkbox"/> UST) (any >1,000 gallons? <input type="checkbox"/> Y <input type="checkbox"/> N // Total >1,320 gal? <input type="checkbox"/> Y <input type="checkbox"/> N)		
	Oil filters* hot drained/crushed/punctured/dismantled? – 7-203(o)		
-	Used absorbents (“speedi-dry,” sawdust, pads); reuseables (e.g., rags) – exempt if laundered per §7-203(w)	_____	_____
	Parts washing wastes/sludges		
	Antifreeze* ( <input type="checkbox"/> propylene-(..HW) <input type="checkbox"/> ethylene glycol – §7-204(i))		
	Tank bottom wastes; sump waters		
	Paints/lacquers/thinners/stains		
	Photographic/X-ray developing wastes* {silver-bearing waste is exempt if recycled per §7-204(g)}		Silver recovered <input type="checkbox"/> on-site <input type="checkbox"/> off-site Other:
	PCBs* (>50 parts per million)		
	Electroplating wastes		
	Pesticides; Herbicides		
	Strong acids/bases* (HW if pH# 2 or §12.5; or, if solid or gaseous, a mixture with distilled water has those pHs)		
	Spent solvents/degreasers; still bottoms		
	Water-miscible fluids* {exempt if recycled per §7-203(l)}		
	Printing wastes (e.g., waste inks, blanket wash)		
	Ignitable wastes (flashpoint <140E F)		
	Gas filters; gas/oil 2-stroke engine waste; bad gas		
	Batteries {exempt if recycled per §7-204(f) or Subchapter 9}		<input type="checkbox"/> returned for core charge
	Other:		
	Other:		

§7-303 Were the hazardous waste determinations accurate and complete? Y\_\_ N\_\_ N/A\_\_

**IV. WASTE MANAGEMENT – for CEGs, SQGs, and LQGs**

- §7-302(a) Has there been disposal of hazardous waste by evaporation? Y\_\_ N\_\_ N/A\_\_
- §7-302(b) Has there been dilution of hazardous waste subject to land disposal restrictions? Y\_\_ N\_\_ N/A\_\_
- §7-302(c) Has there been a release of a hazardous material? {used oil = §7-803(i)} Y\_\_ N\_\_ N/A\_\_
- §7-105(a)/7-806(e) If so, did the facility mitigate and report the release? {universal waste = §7-912(h)} Y\_\_ N\_\_ N/A\_\_
- §7-311(a)(1) Are hazardous wastes accumulated and stored upon an impervious surface? Y\_\_ N\_\_ N/A\_\_
- §7-806(b)(6) Are used oils accumulated and stored upon an impervious surface? Y\_\_ N\_\_ N/A\_\_
- §7-311(a)(2) Are hazardous waste containers within a structure that sheds rain and snow? Y\_\_ N\_\_ N/A\_\_
- § 7-204(f)(1) Are other wastes protected from precipitation and on an impervious surface? Batteries; Y\_\_ N\_\_ N/A\_\_
- §7-203(l)(2)(D) water-miscible fluids {wipes = §7-203(w)(3)(D); antifreeze = §7-204(i)(2)(D)} Y\_\_ N\_\_ N/A\_\_

Comments: \_\_\_\_\_

**(Waste Management, continued) *items in italics are only for SQGs and LQGs***

- §7-306(c)(1)(C) *or §7-309(a)* Is generator minimizing the possibility of fire, explosion, or any release of hazardous waste which could threaten human health or the environment? Y\_\_ N\_\_ N/A\_\_
- §7-311(a)(4) Are there preventive measures for storage of freezable hazardous waste? Y\_\_ N\_\_ N/A\_\_
- §7-806(b)(8) Are used oil/water container(s) prevented from freezing? {water-miscible = §7-203(l)(3)} Y\_\_ N\_\_ N/A\_\_
- §7-311(f)(2) Are hazardous waste containers in good condition? {used oil = §7-806(b)(4)} Y\_\_ N\_\_ N/A\_\_
- §7-311(f)(3) Are hazardous wastes stored in compatible containers? {used oil = §7-806(b)(3)} Y\_\_ N\_\_ N/A\_\_
- §7-912(d)(5)(A)(i) Are universal waste lamps managed to prevent breakage? In adequate container(s)? Y\_\_ N\_\_ N/A\_\_
- §7-311(f)(4)(A) Are HW containers closed when not adding/removing waste? {used oil = §7-806(b)(1)} Y\_\_ N\_\_ N/A\_\_
- §7-203(l)(2)(B) Are containers closed? H<sub>2</sub>O-miscible {rags=§7-203(w)(3)(B); antifreeze=§7-204(i)(2)(B)} Y\_\_ N\_\_ N/A\_\_
- §7-912(d)(5)(A)(ii,iii) Are full boxes of universal waste lamps taped closed? Stored ≤5-feet high? Y\_\_ N\_\_ N/A\_\_
- §7-311(f)(4)(B) *or §7-806(b)(2)* Are haz. waste containers opened, handled and stored in a manner that prevents rupture of the container or leakage? // Are used oil containers managed to prevent a release? Y\_\_ N\_\_ N/A\_\_
- §7-311(f)(4)(C)(i,ii) Have incompatible wastes/materials been placed into separate, washed containers? Y\_\_ N\_\_ N/A\_\_
- §7-311(f)(4)(C)(iii) Are hazardous wastes separated from incompatible materials by dike, berm, wall, etc.? Y\_\_ N\_\_ N/A\_\_
- §7-306(c)(1)(D)(iii) *or §7-310(a)(5)* Are *accumulation* containers marked with the words “Hazardous Waste” and other words that identify the contents? {used oil = §7-806(b)(5); lamps = §7-912(e)(6)} Y\_\_ N\_\_ N/A\_\_
- §7-310(b)(1) Are *shift accumulation* containers brought by a trained employee at the end of each shift (≤12 hours)? Y\_\_ N\_\_ N/A\_\_
- §7-203(l)(2)(A) Are containers marked? H<sub>2</sub>O-miscible {rags=§7-203(w)(3)(A); antifreeze=§7-204(i)(2)(A)} Y\_\_ N\_\_ N/A\_\_
- §7-806(c)(2)/(d)(2) Are used oil UST fill pipe(s) marked? // Are above ground tanks marked “used oil”? Y\_\_ N\_\_ N/A\_\_
- §7-912(f)(3) Can the universal waste handler demonstrate storage ≤ one year? Y\_\_ N\_\_ N/A\_\_

Comments: \_\_\_\_\_

**WASTE STORAGE *items in italics are only for SQGs and LQGs***

Location of HW Storage Area(s): \_\_\_\_\_ Indoors \_\_ Outdoors \_\_

Hazardous Wastes, Universal Wastes, and Used Oil *in Storage*: {CEG limit is 2,200 lbs haz. waste, which is ~5 drums if water}

Waste Type/Code(s)	No./Size of Containers	Container covered?	Properly labeled?*	Date Full	Comments (including if accumulation drum)

\*for SQGs and LQGs: with generator name, address, EPA ID #, drum contents, “HW-Federal Law prohibits . . .” language (and perhaps point of accum?)

- §7-311(e)(1) Is there a warning sign located at each storage area visible from 25 feet? Y\_\_ N\_\_ N/A\_\_
- §7-311(e)(2) Is a “No Smoking” sign posted for ignitable wastes in storage, visible from 25 feet? Y\_\_ N\_\_ N/A\_\_
- §7-311(e) Are these signs in both English and French in counties bordering Quebec? Y\_\_ N\_\_ N/A\_\_
- §7-309(a)(1)(C) Are fire extinguisher(s) and spill cleanup control equipment available? Y\_\_ N\_\_ N/A\_\_
- §7-309(a)(1)(D) Is there a water supply for fire-fighting or a sprinkler/foam system? Y\_\_ N\_\_ N/A\_\_

**In the Storage Area, cont. (for SQGs and LQGs only)**

- §7-309(a)(3) Do employees handling haz. waste have immediate access to a communication device or alarm system? Y\_ N\_ N/A\_
- §7-307(c)(9)(B) **For SQGs:** Is the following information posted by each telephone where haz. waste is managed?
  - (i) Name and telephone numbers (work and home) of emergency coordinators? Y\_ N\_ N/A\_
  - (ii) Location of fire extinguishers, spill control equipment, and fire alarm? Y\_ N\_ N/A\_
  - (iii) Telephone number of fire department (unless there's a direct alarm)? Y\_ N\_ N/A\_
- §7-311(b)(3) Is there adequate aisle space (≥24 inches wide)? Y\_ N\_ N/A\_
- §7-311(b)(2) Are labels visible on all hazardous waste containers in storage? Y\_ N\_ N/A\_
- §7-311(f)(1) Are hazardous waste containers in storage clearly marked with:
  - Generator name, address, and EPA ID number? Y\_ N\_ N/A\_
  - Name and hazardous waste ID number(s) of waste? Y\_ N\_ N/A\_
  - Date container was filled? Y\_ N\_ N/A\_
  - Required warning language (“...Federal Law prohibits improper disposal...”)?? Y\_ N\_ N/A\_
- §7-308(b)(2) **LQGs:** Storage for less than 90 days? **SQGs:** Storage for less than 180 days? {§7-307(c)(2)} Y\_ N\_ N/A\_

**Inventory and Inspection (for SQGs and LQGs only)**

- §7-311(d)(1) Is a current hazardous waste inventory maintained? Y\_ N\_ N/A\_
- §7-311(d)(2) Are daily inspections conducted and is a checklist maintained for each storage area which addresses:
  - (A) Rusting, bulging, or leaking containers or tanks? Y\_ N\_ N/A\_
  - (B) Inspection of safety and emergency equipment? Y\_ N\_ N/A\_
  - (C) Adequate aisle space (≥24 inches between rows of containers)? Y\_ N\_ N/A\_
  - (D) Discrepancies or problems encountered and corrective actions taken? Y\_ N\_ N/A\_
  - (E) Date of inspection and inspector's signature or initials? Y\_ N\_ N/A\_

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Preparedness and Prevention (for SQGs and LQGs only)**

- (questions to ask:)
- §7-309(b)(6) Have hazardous wastes been shipped off-site under manifest(s)? Y\_ N\_ N/A\_
- §7-309(a)(4) Have arrangements been made with local authorities? Y\_ N\_ N/A\_
- §7-307(c)(9)(C) Are **SQG** employees familiar with evacuation routes, proper waste handling, and emergency procedures? Y\_ N\_ N/A\_
  - Is there a list, updated annually, of employees with hazardous waste management responsibilities? Y\_ N\_ N/A\_
- §7-307(c)(9)(A) Is an emergency coordinator (with the authority to implement emergency response procedures)
  - §7-308(b)(9)(D) available within a short period of time? Y\_ N\_ N/A\_
- §7-308(b)(9)(A-B) **for LQGs:** Is there a written up-to-date contingency plan? Submitted to local emergency providers? Y\_ N\_ N/A\_
- §7-308(b)(10)(E) Have **LQG** handlers received annual HW training updates? **Date:** \_\_\_\_\_ Y\_ N\_ N/A\_

Comments: \_\_\_\_\_  
 \_\_\_\_\_

**V. SUMMARY**

Comments or concerns: \_\_\_\_\_  
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**Material provided during the inspection:**

- \_\_\_ Vermont Hazardous Waste Handler Site ID Form (needs to notify if no EPA ID N<sup>o</sup> or if information has changed)
- \_\_\_ Vermont Hazardous Waste Management Regulations (VHWMR) – October 1, 2004
- \_\_\_ Conditionally Exempt Generators’ Handbook
- \_\_\_ Generator Handbook
- \_\_\_ DEC Office of Environmental Assistance brochure(s):  pollution prevention  compliance assistance
- \_\_\_ inspector’s business card

Fact Sheet(s):

- |   |  |
|---|--|
| <input type="checkbox"/> Antifreeze   | <input type="checkbox"/> Oil Filters                                       |
| <input type="checkbox"/> USDOT Regulation Affects Haz. Waste Generators           | <input type="checkbox"/> Paints & Thinners                                 |
| <input type="checkbox"/> Dry Cleaning - Hazardous Waste Generation                | <input type="checkbox"/> Managing Waste <u>Paint Booth Filters</u>         |
| <input type="checkbox"/> Floor Drains   | <input type="checkbox"/> Parts Cleaning Solvent                            |
| <input type="checkbox"/> Fluorescent Lamps: Handling and Disposal Guidelines      | <input type="checkbox"/> Shop Rags & Oily Wastes                           |
| <input type="checkbox"/> Hazardous Waste <u>Generator Status</u> Comparison Table | <input type="checkbox"/> Spills  |
| <input type="checkbox"/> Lead Abatement Project Wastes                            | <input type="checkbox"/> Federal <u>SPCC</u> Regulation                    |
| <input type="checkbox"/> Lead Acid Batteries                                      | <input type="checkbox"/> Hazardous Waste <u>Transporter Permit Process</u> |
| <input type="checkbox"/> Waste <u>Mercury-Added Devices</u> : Handling & Disposal | <input type="checkbox"/> Managing <u>Treated Wood</u> Waste                |
| <input type="checkbox"/> Used <u>Oil</u>  | <input type="checkbox"/> Managing Used <u>TVs and Computer Monitors</u>    |
| <input type="checkbox"/> Used <u>Oil Burning</u>                                  |  |

Pollution Prevention (P<sup>2</sup>) Information:

- |   |   |
|---|---|
| <input type="checkbox"/> Coolant & Cutting Oil P <sup>2</sup> Options Checklist | <input type="checkbox"/> Best Management Practices for VT Auto <u>Salvage Yards</u> |
| <input type="checkbox"/> Metal Coating P <sup>2</sup> Options Checklist         | <input type="checkbox"/> Wood Finishing P <sup>2</sup> Options Checklist            |
| <input type="checkbox"/> Plating P <sup>2</sup> Options Checklist               | <input type="checkbox"/> VT Business Materials Exchange information                 |
| <input type="checkbox"/> Printing P <sup>2</sup> Options Checklist              |   |

Guides to Vermont’s Environmental Regulations (from Vermont’s Environmental Assistance Division):

- |  |  |
|--|--|
| <input type="checkbox"/> An Autobody Repair Technician’s Guide     | <input type="checkbox"/> A Printer’s Guide                             |
| <input type="checkbox"/> A Metal Fabricator’s Guide                | <input type="checkbox"/> A Vehicle Service & Repair Technician’s Guide |
| <input type="checkbox"/> A First Place Finish (for Wood Finishers) |  |

- Other(s):  Example Daily Inspection Checklist
- Example Hazardous Waste Inventory Log
- Example SQG Emergency Response Info & Procedures

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