PROJECT	RCRA COMPLIANCE EVALUATION INSPECTION CHECKLIST
FACILITY	
ADDRESS	
CITY	
STATE	
RCRA ID#	
LEAD INSPECTOR	

CHECKLIST ROADMAP

CHECKLIST	INCLUDED?
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APPENDIX 2-1. LAND DISPOSAL RESTRICTIONS

1. Location of waste analysis/waste determination records:_____

2. Person responsible for waste analysis/waste determination records:_____

A. GENERATOR REQUIREMENTS

For generator facilities, these are required by reference—262.16(b)(7) for SQGs and 262.17(a)(9) for LQGs. Any citations should also include the reference.

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Determines waste or soil contaminated with waste does **meet the ATS or does not exceed prohibition levels** and requires no further treatment-**268.7(a)(3)**	
2.		Submits one-time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-**268.7(a)(3)(i)**	
3.		If soil contaminated with waste, includes a special certification statement with the notice-**268.7(a)(2)**	
4.		Generator's waste analysis plan on site for treatment in tanks/containers to meet LDR treatment standards found in 268.40-**268.7(a)(5)**	
5.		If shipping off site, provides a notice and certification statement with initial shipment, or re-notification if the waste changes-**268.7(a)(3)-268.7(a)(5)(iii)**	
6.		Determines waste or contaminated soil to be restricted based solely on knowledge of the waste, and maintains all supporting data on site in generator's files-**268.7(a)(6)**	
7.		Determines waste or contaminated soil to be restricted based on testing the waste or an extract, and maintains all supporting data on site in generator's files-**268.7(a)(6)**	
8.		Manages lab pack containing hazardous waste(s) and wants to use the alternative treatment standards-**268.7(a)(9)**	
9.		Provides a notice and certification with initial shipment for lab pack waste with ATS-**268.7(a)(9)(i)**	
10.		If change in waste or receiving facility occurs, new notice and certification is provided-**268.7(a)(9)(ii)**	

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
11.		Determines waste to be excluded from the definition of hazardous or solid waste, or exempt from Subtitle C regulations under 261.2 through 261.6 subsequent to the point of generation, and retains a one-time notice describing generation, subsequent exclusion or exemption, and disposition of the waste in the facility's on-site files-**268.7(a)(7)**	
12.		If claiming that hazardous debris is excluded from the definition of hazardous waste under 261.3(e), submits one-time notification to EPA or authorized state-**268.7(d)(1)**	
13.		If claiming that hazardous debris is excluded from the definition of hazardous waste under 261.3(e), updates the notification if debris is shipped to another location, if different debris is treated, or if a different technology is used for treatment-**268.7(d)(2)**	
14.		For contaminated soil subject to alternative LDR treatment standards in 268.49(a), determines or receives a determination from EPA or an authorized state that such contaminated soil no longer exhibits a characteristic of hazardous waste-**268.7(e)**	
15.		Prepares one-time-only documentation of these determinations, including all supporting information-**268.7(e)(1)**	
16.		Maintains the one-time documentation of the determinations, including all supporting information and other records, for a minimum of 3 years-**268.7(e)(2)**	

√ - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

B. TREATMENT, STORAGE, AND DISPOSAL FACILITY (TSDF) REQUIREMENTS

Requirements for interim status facilities (40 CFR Part 265) are used for all citations in **APPENDIX 2-1.B**. For permitted TSDFs, cite the parallel requirement from the facility permit.

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Undertakes complete analysis before treatment, storage, or disposal-**265.13(a)(1)**	
2.		Has method to inspect, track, and analyze all off-site generated waste for consistency with manifest descriptions-**265.13(c)**	
3.		Has written plan on site that specifies the following: parameters, rationale, test methods, sampling methods, frequency, waste analysis information from generator, and list of applicable waste analysis methods to meet additional waste management requirements including LDR-**265.13(b)**	
4.		Tests waste at frequency specified in the waste analysis plan-**268.7(b)**	
5.		Sends a one-time notice with the initial shipment of waste or contaminated soil to the land disposal facility, and sends a new notice if change in waste or receiving facility occurs-**268.7(b)(3)**	
6.		Submits a one-time certification with the initial shipment of waste or treatment residue of a restricted waste to the land disposal facility, and keeps a copy of the certification in the facility file-**268.7(b)(4)**	
7.		If waste or treatment residue is to be further managed at a different TSD, meets generator notice and certification requirements-**268.7(b)(5)**	
8.		If wastes are recyclable materials used in a manner constituting disposal subject to treatment standards and prohibition levels, submits a treatment facility notice and certification to the EPA R.A. or designee -**268.7(b)(6)**	
9.		Except for 8 (above), has copies of the generator and treatment facility notices and certifications-**268.7(c)(1)**	
10.		Except for 8 (above), tests the waste or an extract of the waste or the treatment residue to assure that these comply with the ATS, and testing occurs at the frequency specified in the waste analysis plan-**268.7(c)(2)**	

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
11.		If claiming that hazardous debris is excluded from the definition of hazardous waste, submits a one-time notification to EPA or authorized state-**268.7(d)(1)**	
12.		If claiming that hazardous debris is excluded from the definition of hazardous waste, updates the notification if debris is shipped to another location, if different debris is treated, or if a different technology is used for treatment-**268.7(d)(2)**	
13.		For debris excluded under 261.3(e)(1), documents and certifies compliance with treatment standards by retaining the following: documentation of all inspections, evaluations, and analyses of treated debris; data or information that identifies key operating parameters of the treatment unit; and signed certification that standards were met-**268.7(c)(3)**	
14.		For contaminated soil subject to alternative LDR treatment standards in 268.49(a), determines or receives a determination from EPA or an authorized state that such contaminated soil no longer exhibits a characteristic of hazardous waste-**268.7(e)**	
15.		For contaminated soil subject to alternative LDR treatment standards in 268.49(a), prepares one-time-only documentation of these determinations including all supporting information-**268.7(e)(1)**	
16.		For contaminated soil subject to alternative LDR treatment standards in 268.49(a), maintains the one-time documentation of the determinations, including all supporting information and other records, for a minimum of 3 years-**268.7(e)(2)**	

√ - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

APPENDIX 2-2. EPISODIC GENERATION

A. VERY SMALL QUANTITY GENERATOR (VSQG) REQUIREMENTS

Any deficiency in items described below indicates that the generator has not met the requirements to maintain its existing generator category regarding hazardous waste, and must be inspected for the requirements of the new generator category (SQG or LQG).

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		If the VSQG threshold has been exceeded more than once in the calendar year, petitions for an exception-**262.232(a)(1)**	
2.		For planned event, notifies EPA no later than 30 days before the event using EPA Form 8700-12-**262.232(a)(2)**	
3.		For an unplanned event, notifies EPA no later than 72 hours after the event and subsequently submits EPA Form 8700-12-**262.232(a)(2)**	
4.		Includes in notification start and end dates, reason for the event, types and estimated quantities of hazardous waste, and site contact information-**262.232(a)(2)**	
5.		Has an EPA ID number-**262.232(a)(3)**	
6.		Accumulates hazardous waste generated during the event in a container or tank-**262.232(a)(4)**	
7.		If hazardous waste is in containers, labels containers (A) as "Episodic Hazardous Waste," (B) with an indication of the nature of the hazard, and (C) with the episodic accumulation start date-**262.232(a)(4)(i)(A) through (i)(C)**	
8.		If hazardous waste is in containers, keeps containers closed and in good condition-**262.232(a)(4)(iii)(A)**	
9.		If hazardous waste is in tanks, labels tanks (A) as "Episodic Hazardous Waste" and (B) with an indication of the nature of the hazard-**262.232(a)(4)(ii)(A) and (ii)(B)**	
10.		If hazardous waste is in tanks, has (C) a log or other means to identify episodic accumulation start date and (D) records readily available for inspection-**262.232(a)(4)(ii)(C) and (ii)(D)**	
11.		If hazardous waste is in tanks, keeps tanks in good condition-**262.232(a)(4)(iii)(B)**	
12.		If hazardous waste is in tanks, uses compatible tanks-**262.232(a)(4)(iii)(B)**	
13.		If hazardous waste is in tanks, has procedures in place to prevent overflow-**262.232(a)(4)(iii)(B)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
14.		If hazardous waste is in tanks, inspects tanks daily-**262.232(a)(4)(iii)(B)**	
15.		Complies with all manifest requirements in 262 Subpart B-**262.232(a)(5)**	
16.		Sends all episodic hazardous waste to a designated facility within 60 days of the beginning of the episodic generation-**262.232.(a)(6)**	
17.		Maintains records of the episodic generation, including (i) beginning and end dates, (ii) description of the episodic event, (iii) description of types and quantities of hazardous wastes, (iv) description of hazardous waste management with RCRA designated facility identified, (v) name of hazardous waste transporters, and (vi) an approval letter for any petition for a second event-**262.232(a)(7)(i) through (7)(vi)**	
18.		Maintains records of the episodic generation for 3 years after event-**262.232(a)(7)**	

B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

Any deficiency in items described below indicates that the generator has not met the requirements to maintain its existing generator category for hazardous waste and must be inspected for the requirements of a LQG.

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		If the SQG threshold has been exceeded more than once in the calendar year, petitions for an exception-**262.232(b)(1)**	
2.		For planned event, notifies EPA no later than 30 days before the event-**262.232(b)(2)**	
3.		For an unplanned event, notifies EPA no later than 72 hours after the event-**262.232(b)(2)**	
4.		Includes in notification start and end dates, reason for the event, types and estimated quantities of hazardous waste, and site contact information-**262.232(b)(2)**	
5.		Has an EPA ID number-**262.232(b)(3)**	
6.		Accumulates hazardous waste generated during the event in a container or tank-**262.232(b)(4)**	
7.		If hazardous waste is in containers, labels containers (A) as "Episodic Hazardous Waste," (B) with an indication of the nature of the hazard, and (C) with the episodic accumulation start date-**262.232(b)(4)(i)(A) through (i)(C)**	
8.		If hazardous waste is in tanks, labels tanks (A) as "Episodic Hazardous Waste" and (B) with an indication of the nature of the hazard-**262.232(b)(4)(ii)(A) and (ii)(B)**	
9.		If hazardous waste is in tanks, has (C) a log or other means to identify episodic accumulation start date and (D) records readily available for inspection-**262.232(b)(4)(ii)(C) and (ii)(D)**	
10.		Sends all episodic hazardous waste to a designated facility within 60 days of the beginning of the episodic generation-**262.232.(a)(5)**	
11.		Maintains records of the episodic generation, including (i) beginning and end dates, (ii) description of the episodic event, (iii) description of types and quantities of hazardous wastes, (iv) description of hazardous waste management with RCRA designated facility identified, (v) names of hazardous waste transporters, and (vi) an approval letter for any petition for a second event-**262.232(a)(6)(i) through (6)(vi)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
12.		Maintains records of the episodic generation for 3 years after event-**262.232(a)(6)**	

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APPENDIX 2-3. RCRA AIR EMISSIONS

A. PROCESS VENTS (SUBPART AA)

Background: If a facility (TSD or LQG) manages hazardous wastes containing greater than 10 ppmw of organics in a process vent used in distillation, fractionation, solvent extraction, thin- film evaporation, air or steam stripping, Subpart AA may apply (264/5.1030). Subpart AA would not apply in a bona-fide closed loop scenario at LQGs and TSDs. To comply, the facility would need to determine if the process vent(s) releases greater than 3.0 lbs/hr and 3.1 tons/year of organic air emissions to the atmosphere. If the facility does not release that much, it is in compliance with Subpart AA. If its emissions are greater, a control device is necessary to bring the facility into compliance. The control device may be a condenser, flare, carbon absorber, etc. that brings the equipment's emission rate below the 3.0 lbs/hr **and** 3.1 tons/year, **or** reduces organic emissions by 95%.

Objective: The Inspector should try to determine if Subpart AA applies at a particular facility, and, if applicable, evaluate the facility's efforts to achieve compliance. Has the facility calculated or measured organic emissions from all vents and compared that total measurement with the emissions limit?

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Does the facility have any hazardous waste management unit(s) using the following processes: distillation, fractionation, thin-film evaporation, solvent extraction, air stripping and steam stripping? If NO, proceed to the Subpart BB checklist. If YES, list at the right each process vent associated with one of the processes.	
a.		Are any of these processes exempt under the closed loop recycle exemption? If YES, please explain.	
b.		Does the hazardous waste contain greater than 10 ppmw organics?	
c.		For those process vents with a yes answer to 1(b), describe the waste(s), unit(s), and processes.	
d.		Identify those process vents with a no answer to 1(b), and describe the information/documentation used to make the determination (collect this information and submit to EPA).	
2.		2(a). Does the total hourly emission rate of the affected process vents exceed 3 lb/hr? … **AND** ... 2(b). Does the facility-wide yearly emission rate exceed 3.1 tons/yr?	
a.		If the answer to 2(a) or 2(b) is NO, describe the calculations by the company to support this determination (Provide copies of the calculations and associated information, and submit these to EPA.)	

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
b.		If the answer to 2(a) or 2(b) is Yes, did the facility install control devices to reduce the emissions? (**ALL TSDs MUST HAVE CONTROL DEVICES IN PLACE.**)	
c.		Do the calculations/analysis seem reasonable? Are they current? Are facility operating hours (e.g., 8 or 24 hours/day) correct? Have worst-case scenarios been considered?	
3.		Are control devices inspected and/or monitored at least once each operating day to ensure proper operation? -264/5.1035(c)	
a.		Is there any indication of a problem with operation of control devices?	
b.		If problems arose, were corrective measures implemented immediately?	
4		**IF THE FACILITY IS SUBJECT TO THE SUBPART AA RULE AND IS USING A CONTROL DEVICE, COLLECT THE DESIGN DATA AND MONITORING DATA, AND FORWARD TO APPROPRIATE EPA PERSONNEL FOR REVIEW.**	

√ - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

B. EQUIPMENT LEAKS (SUBPART BB)

Background: If a facility (TSD or LQG) has equipment (any valve, pump, compressor, pressure relief device, sampling connection system, flange, open-ended valve or line) that contacts hazardous wastes containing greater than 10 percent organics, that facility is subject to the inspection and monitoring requirements of Subpart BB (264/5.1050). If the equipment used to transport hazardous waste containing greater than 10 percent organics is used for less than 300 hours per year, and if the equipment is identified as required in 264/265.1064(g)(6), the facility is excluded from the requirements of 264/265.1052 through 264/265.1060 of this subpart.

Objective: The Inspector should try to determine if Subpart BB applies at a particular facility, and, if applicable, evaluate the facility's Leak Detection and Repair (LDAR) program. Does it cover all affected equipment? What is frequency (monthly, quarterly) of efforts at leak detection and repair? Are records maintained of timely (<15 days) equipment repair when leaks are detected. The importance of compliance with Subpart BB is a function of the amount and volatility of a facility's waste.

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		**FOR PUMPS AND VALVES IN LIGHT LIQUID OR GAS/VAPOR SERVICE**	
a.		**LIGHT LIQUID SERVICE:** For a hazardous waste to be in light liquid service, the vapor pressure of one or more organic constituents in the material must exceed 0.3 kilopascals at 20 degrees Centigrade, and total concentration of pure organic constituents exerting vapor pressure exceeding 0.3 kilopascals at 20 degrees Centigrade must equal or exceed 20 percent by weight.	
b.		Is each pump in light liquid service monitored monthly to detect leaks?-264/5.1052(a)(l)	
c.		Is each pump in light liquid service checked by visual inspection each calendar week for indications of liquids dripping from the pump seal?-264/5.1052(a)(2)	
d.		Is each valve in light liquid service or gas/vapor service monitored monthly for leaks?-264/5.1057(a)	
2.		**EQUIPMENT IN HEAVY LIQUID SERVICE**	
a.		Are pumps, valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors in light liquid or heavy liquid service monitored for leaks by visual, olfactory, or any other detection method?	

√ - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

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C. TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS (SUBPART CC)

OVERVIEW: Subpart CC regulations apply to LQGs and TSD facilities that manage in tanks and containers hazardous waste containing volatile organic concentrations averaging 500 ppmw or more on an annual basis. For tank storage, a facility may manage its waste at two levels: Tank Level 1 requires a fixed roof to maintain a maximum organic vapor pressure complying with Subpart CC. Tank Level 2 design options number five: (1) an Internal Floating Roof, (2) an External Floating Roof, (3) a tank with a Fixed Roof vented through a closed vent system to a control device, (4) a Pressure Tank, and (5) a tank located inside an enclosure that is vented through a closed vent system to an enclosed combustion device.

Most facilities comply with Tank Level 1, the easiest to implement. The other frequently selected option is Tank Level 2 Option 3. A small number of facilities choose to implement the other options, and inspection of these facilities should be referred to EPA. As a result, the emphasis of this checklist is on Tank Level 1 and Tank Level 2 Option 3.

For Container Storage, most facilities store their waste in DOT-approved containers. RCRA regulations already cover such storage, and as a result, those facilities comply with the container storage regulations of Subpart CC regulations. The checklist does not deal with Surface Impoundments because only a few active ones remain in the Region. These should be referred to EPA for inspection.

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
1.		Is this facility a TSD or a Large Quantity Generator(LQG)? ***If NOT, STOP because Air Emissions-Subpart CC regulations do not apply***.	
2.		Are any units at the facility subject to the CC Rule?	

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
a.		If the answer is no, what is the reason? Ref. 40 CFR 264/5.1080(b) exceptions or 265.1083(c) or 264.1082(c) exemptions, or the general exclusions in 264/5.1(g), as applicable. **40 CFR 264/265.1080(b) exemptions:** _____(1) Unit did not receive HW after 12/6/96_____(2) Using containers of less than 26 gallons capacity___(3) Unit undergoing closure _____(4) Units used in an on-site RCRA or CERCLA cleanup____(5) Mixed Radioactive and hazardous waste _____(6) Units with CAA, NESHAPS, or NSPS controls__(7) Tanks with process vents (subject to Subpart AA) **40 CFR 265.1083(c) exemptions:** _____(8) Waste stream less than 500 ppmw average VOCs._If so; was waste determination conducted per 265.1084? _____YES____NO ____(9) All waste placed in unit meets 268.40 (LDR) limits _____(10) Tank is used for bulk feed to incinerator, and requirements of 265.1083(5)(i)-(iii) are met **40 CFR 265.1 General exclusions/exemptions:** ____(11) Hazardous waste recycling unit exemption ___(12) Satellite accumulation area____(13) Totally enclosed treatment facility exemption___(14) Elementary neutralization unit_____(15) Waste water treatment in tanks exemption____(16) Emergency or spill management exemption_____ (17) Biological treatment with 95% efficiency_____Except if exemption is based on (8) above, **STOP** because Subpart CC does not apply.	
w3.		Is average volatile organic concentration in each waste management unit exceeding 500 ppmw determined on an average annual basis at the point of waste origination? **NOTE: If facility claims that volatile organic concentration in its waste is below 500 ppmw, waste determination documentation should be in the operating record. Inspector should review this documentation and obtain a copy.**	
a.		Are any units subject to Subpart CC? If YES, does the facility have a list of each unit and the concentration in its operating record? If NO, indicate if the determination for each unit is in the facility operating record?- 264.1089/265.1090	
4.		**FOR EACH UNIT WITH HAZARDOUS WASTE DETERMINED TO CONTAIN LESS THAN 500 PPMW OF VOCs, ANSWER THE FOLLOWING QUESTIONS:**	
a.		How was waste determination conducted? By use of knowledge or sampling? – Ref 40 CFR 264.1083/265.1084	

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
b.		If knowledge was used, is any documentation on file?	
c.		Is the documentation adequate?	
d.		If sampling was used, does the facility have a written sampling plan?	
e.		If facility used sampling, was the sampling performed according to an EPA-approved method? Which method?	
f.		Has the waste stream changed since the initial waste determination in a manner altering the character of the waste or causing exceedance of threshold levels for applicability of Subpart CC?	
g.		If so, was a new waste determination conducted? If YES, repeat 4 (a)-(e)	
CONTAINERS: Ref. 40 CFR 264.1086/265.1087 **LIGHT LIQUID SERVICE:** For a hazardous waste to be in light liquid service, the vapor pressure of one or more of the organic constituents in the material must exceed 0.3 kilopascals at 20 degrees Centigrade, and total concentration of pure organic constituents must exert a vapor pressure exceeding 0.3 kilopascals at 20 degrees Centigrade, and must equal or exceed 20 percent by weight.			
1.		**LEVEL ONE:** There should be no waste stabilization. Containers must be >0.1 cubic meters (26.4 gal) and < or = to 122 gallons. If the organic waste is not in light liquid service, its volume can exceed 122 gallons.	
a.		**OPTION 1-** The container meets DOT specifications.	
b.		**OPTION 2-** Use a cover and closure device on the container, and ensure absence of visible gaps in the interior of the container or holes in the covers.	
c.		**OPTION 3-** Use vapor suppressing barrier on or above the hazardous waste in the container.	
2.		**LEVEL TWO:** There should be no waste stabilization. Containers are larger than 0.46 cubic meters (122 gal) and are in light liquid service.	
a.		**OPTION 1-** The container meets DOT specifications.	
b.		**OPTION 2-** Operates with no detectible emissions from the container under Method 21.	
c.		**OPTION 3-** Demonstrated to be vapor tight within the last 12 months via application of Method 27.	
3.		**LEVEL THREE:** Container must be used for waste stabilization. Vent vapors from containers and remove or destroy them in a control device. Put container in a "Procedure T Enclosure," vent vapors, and destroy them in a control device.	

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
4.		Is the level of control imposed at the facility in compliance? **NOTE: Most facilities are in compliance if not conducting waste stabilization, and if they store their waste in DOT-approved, 55-gallon drums.**	
TANKS SUBJECT TO SUBPART CC Ref 40 CFR 264.1084/265.1085			
1.		Is hazardous waste with average volatile organics concentration exceeding 500 ppmw placed in a tank with either level 1 or level 2 controls?-264.1084(b)(1)/265.1085(b)(1)	
a.		Were the tanks inspected for leaks before waste was placed into the tanks? If yes, when did this occur?	
b.		During tank storage of hazardous waste, did an annual inspection of the tanks occur as described above? If yes, when did this occur?	
		Note: The fixed roof and its closure devices shall be visually inspected by the owner/operator to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank walls; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. An initial inspection should occur before any waste is stored in the tank, and at least once annually thereafter.	
c.		Indicate options/level for each tank	
		For tanks with level 1 control: Tank must meet three conditions for level 1 control: (1) Waste maximum organic vapor pressure less than cutoff for tank design capacity, (2) No heating ≥temperatures at which vapor pressure is determined (either by knowledge or by measurement), and (3) No waste stabilization in tank	
2.		Facility is in compliance. **NOTE: Inspector should check for vapor pressure determinations, collect information, and bring this back to office.**	
a.		**FOR TANKS WITH LEVEL 2/OPTION 3 CONTROLS OPTION 3—Fixed roof tank venting through a closed vent system, to a control device that would destroy or reduce at least 95% of vapors.**	
3.		Is the fixed roof forming a continuous barrier over the entire surface area of the liquid in the tank?	
a.		Are emissions vented to a control device?	

#	√/X/NA	REGULATORY REQUIREMENTS*	COMMENTS
b.		Are all openings in the roof not venting to the control device fixed with a closure device?	
c.		If vapor pressure underneath the fixed roof cover is less than atmospheric pressure when control device is working, and the closure device is closed, are any cracks, holes, gaps, or other open spaces visible between cover opening and closure device?	
d.		If vapor pressure below the fixed roof cover equals or exceeds atmospheric pressure when the control device is working, are the cover and closure device designed to operate at NDE?	
e.		Are the cover and closure devices closed at all times and the vapor headspace vented to a control device except when owner/operator is: (1) performing inspections or (2) conducting maintenance or other normal operations or(3) accessing the tank or (4) removing accumulated sludge and other residues from the bottom of the tank.	
f.		**NOTE: Inspector should collect monitoring data from the control device and design data, and bring these sets of data back to the office for review. For all other options, refer to applicable regulations at 264.1084/265.1085**	

√ - in compliance X – not in compliance NA – not applicable * - please note applicable permit req.

APPENDIX 2-4. WASTES RECEIVED FROM VERY SMALL QUANTITY GENERATORS

Note: Per 262.17(f), if the facility does not meet these requirements, it should be considered a treatment, storage, or disposal facility subject to permitting requirements, and should be cited for operating a TSDF without a permit for deficiency.

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Submits a notification to EPA at least 30 days before receiving the first shipment from the VSQG-**262.17(f)(1)**	
2.		Records of shipments received from the VSQG are maintained for 3 years-**262.17(f)(2)**	
3.		Records of shipments received from the VSQG include name, address, and contact information for the VSQG; description of the waste; quantity of waste received; and date waste received-**262.17(f)(2)**	
4.		Containers from the VSQG are managed according to all LQG container requirements-**262.17(f)(3)**	
5.		Containers from the VSQG are marked with the accumulation start date, which is the date the waste was received by the LQG-**262.17(f)(3)**	

√ - in compliance X – not in compliance NA – not applicable

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APPENDIX 2-5. USED OIL

A. TRANSPORTERS AND TRANSFER CENTERS (SUBPART E)

If used oil is held for:

- Less than 24 hours, complete only section 1 below.
- More than 24 hours up to 35 days, complete sections 1 and 2 below.
- Longer than 35 days, go to Appendix 2-5.B below.

A.1. Transporters AND Transfer Centers

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Complies with notification requirements of RCRA Section 3010, and obtained an EPA ID number-**279.42(a)**	
2.		Delivers all used oil to: another used oil transporter, processing/re-refining facility, or off-specification used oil burner facility with an EPA ID number; or an on-specification used oil burner facility-**279.43(a)**	
3.		Complies with all applicable DOT packaging and labeling requirements-**279.43(b)**	
4.		Takes appropriate immediate action to protect human health and the environment in the event of a discharge of used oil during transportation-**279.43(c)**	
5.		Determines whether total halogen content of used oil transported or stored at a transfer facility is above or below 1,000 ppm-**279.44(a)**	
6.		Determines halogen content by testing the used oil or applying knowledge of halogen content of the used oil in light of the materials or processes used-**279.44(b)**	
7.		For used oil with more than 1,000 ppm halogen content, rebuts the presumption that the used oil has been mixed with hazardous waste-**279.44(c)**	
8.		Retains all records of analysis and information used to comply with this section for at least 3 years-**279.44(d)**	
9.		Keeps a record of each used oil shipment **accepted** that includes: (1) name and address of the used oil generator, etc., (2) EPA ID number of the generator etc., (3) quantity of used oil, (4) date of acceptance, and (5) signature of generator, etc.-**279.46(a)(1) through (a)(5)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
10.		Keeps a record of each used oil shipment **delivered** that includes: (1) name and address of the used oil receiver etc., (2) EPA ID number of the receiver etc., (3) quantity of used oil, (4) date of delivery, and (5) signature of generator, etc.-**279.46(b)(1) through (b)(5)**	
11.		Keeps all records of used oil accepted and delivered for 3 years-**279.46(d)**	
12.		Manages all residues generated from storage or transport of used oil according to all requirements of 279.10(e)-**279.47**	

√ - in compliance X – not in compliance NA – not applicable

A.2. Transfer Centers Only

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Stores used oil only in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265-**279.45(b)**	
2.		Uses only containers and aboveground tanks that are (1) in good condition and (2) have no visible leaks-**279.45(c)(1) and (c)(2)**	
3.		For containers, has secondary containment system that includes dikes, berms or retaining walls; and a floor OR an equivalent secondary containment system-**279.45(d)(1)**	
4.		Ensures that secondary containment system for used oil containers is impervious-**279.45(d)(2)**	
5.		For ASTs, has a secondary containment system that includes dikes, berms or retaining walls; and a floor OR an equivalent secondary containment system-**279.45(e)(1) (pre-1992 tanks) or 279.45(f)(1) (post-1992 tanks)**	
6.		Ensures the secondary containment system for used oil ASTs is impervious-**279.45(e)(2) (pre-1992 tanks) or 279.45(f)(2) (post-1992 tanks)**	
7.		Labels containers and ASTs as “Used Oil”-**279.45(g)(1)**	
8.		Labels fill pipes used for underground tanks as “Used Oil”-**279.22(g)(2)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
9.		Upon detection of a release, (1) stops the release, (2) contains the release, (3) cleans up and manages the used oil and other materials, and (4) repairs or replaces the containers or tanks prior to returning them to service, if necessary- **279.45(h)(1) through (h)(4)**	

√ - in compliance X – not in compliance NA – not applicable

B. PROCESSORS AND RE-REFINERS (SUBPART F)

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Complies with the notification requirements of RCRA Section 3010, and obtained an EPA ID number-**279.51(a)**	
2.		Maintains and operates the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of used oil-**279.52(a)(1)**	
3.		Has the following equipment: (i) internal communications or alarm system; (ii) a device such as a telephone or hand-held, two-way radio capable of summoning emergency assistance; (iii) fire suppression, spill control, and decontamination equipment; and (iv) water at adequate volume and pressure to supply hose streams, foam producing equipment, automatic sprinklers, or water spray systems-**279.52(a)(2)(i) through (2)(iv)**	
4.		Tests and maintains all facility communications or alarm systems and fire suppression, spill control, and decontamination equipment-**279.52(a)(3)**	
5.		Provides access to an internal alarm or emergency communication device whenever used oil is being poured, mixed, spread, or otherwise handled-**279.52(a)(4)**	
6.		Has sufficient aisle space to allow unobstructed movement of personnel and fire suppression, spill control, and decontamination equipment in an emergency-**279.52(a)(5)**	
7.		Makes arrangements to familiarize local authorities with the layout of the facility, properties of used oil handled at the facility, and potential need for services of these organizations-**279.52(a)(6)**	
8.		Has a contingency plan (or equivalent)-**279.52(b)(1)**	
9.		Ensures the contingency plan meets all content requirements-**279.52(b)(2)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
10.		Ensures contingency plan is (i) maintained at the facility and (ii) submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services-**279.52(b)(3)(i) and (3)(ii)**	
11.		Amends contingency plan when necessary-**279.52(b)(4)**	
12.		Designates an emergency coordinator (EC) and ensures that person is on site or on-call-**279.52(b)(5)**	
13.		Determines whether total halogen content of used oil managed at the facility is above or below 1,000 ppm-**279.53(a)**	
14.		Determines halogen content by testing used oil or applying knowledge of halogen content of the used oil in light of materials or processes used-**279.53(b)**	
15.		For used oil with more than 1,000 ppm halogen content, rebuts the presumption that the used oil has been mixed with hazardous waste-**279.53(c)**	
16.		Stores used oil only in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265-**279.54(a)**	
17.		Uses only containers and aboveground tanks that are (1) in good condition and (2) have no visible leaks-**279.54(b)(1) and (b)(2)**	
18.		For containers, has a secondary containment system that includes dikes, berms, or retaining walls; and a floor OR an equivalent secondary containment system-**279.54(c)(1)**	
19.		Ensures the secondary containment system for used oil containers is impervious-**279.54(c)(2)**	
20.		For ASTs, has a secondary containment system that includes dikes, berms, or retaining walls; and a floor OR an equivalent secondary containment system-**279.54(d)(1) (pre-1992 tanks) or 279.54(e)(1) (post-1992 tanks)**	
21.		Ensures the secondary containment system for used oil ASTs is impervious-**279.54(d)(2) (pre-1992 tanks) or 279.54(e)(2) (post-1992 tanks)**	
22.		Labels containers and ASTs as “Used Oil”-**279.54(f)(1)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
23.		Labels fill pipes used for underground tanks as "Used Oil"-**279.54(f)(2)**	
24.		Upon detection of a release, (1) stops the release, (2) contains the release, (3) cleans up and manages the used oil and other materials, and (4) repairs or replaces the containers or tanks prior to returning them to service, if necessary-**279.54(g)(1) through (g)(4)**	
25.		Upon closure of a tank system, removes all tanks, associated structures, and residues; and complies with closure and post-closure requirements-**279.54(h)(1)**	
26.		Upon closure of a container area, removes all containers, associated structures, and residues; and complies with closure requirements-**279.54(h)(2)**	
27.		The processor develops, keeps on site, and follows a written waste analysis plan describing procedures for complying with the rebuttal presumption for used oil (40 CFR 279.53) and on-specification used oil fuel (40 CFR 279.72-**279.55)**	
28.		Keeps a record of each used oil shipment **accepted** that includes: name and address of the (1) transporter and (2) generator; EPA ID number of the (3) transporter and (4) generator; (5) quantity of used oil; and (6) date of acceptance-**279.56(a)(1) through (a)(6)**	
29		Keeps a record of each used oil shipment **delivered** to another facility that includes: name and address of the (1) used oil transporter and (2) subsequent facility; EPA ID number of the (3) transporter and (4) subsequent processor; (5) quantity of used oil; and (6) date of shipment-**279.56(b)(1) through (b)(6)**	
30.		Keeps all records of used oil accepted and delivered for 3 years-**279.56(c)**	
31.		Keeps a written operating record-**279.57(a)(1)**	
32.		Includes in the operating record: (i) records and results of used oil analyses performed as described in the analysis plan, and (ii) summary reports and details of all incidents that require implementation of the contingency plan-**279.57(a)(2)(i) and (2)(ii)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
33.		Reports the following information to EPA biennially: (1) EPA ID number, name, and address of the processor; (2) calendar year covered by the report; and (3) quantities of used oil accepted for processing or re- refining and the manner in which the used oil is processed/re-refined-**279.57(b)(1) through (b)(3)**	
34.		Ensures that used oil is transported only by a transporter that has obtained an EPA ID number-**279.58**	

√ - in compliance X – not in compliance NA – not applicable

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C. BURNERS WHO BURN OFF-SPECIFICATION USED OIL FOR ENERGY RECOVERY (SUBPART G)

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Only burns off-specification used oil fuel for energy recovery in the devices listed in 40 CFR 279.61-**279.61(a)**	
2.		Complies with the notification requirements of RCRA Section 3010, and obtained an EPA ID number-**279.62**	
3.		Determines whether total halogen content of used oil managed at the facility is above or below 1,000 ppm-**279.63(a)**	
4.		Determines halogen content by testing the used oil or applying knowledge of halogen content of the used oil in light of materials or processes used-**279.63(b)**	
5.		For used oil with more than 1,000 ppm halogen content, rebuts the presumption that the used oil has been mixed with hazardous waste-**279.63(c)**	
6.		Stores used oil only in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265-**279.64(a)**	
7.		Only uses containers and aboveground tanks that are (1) in good condition and (2) have no visible leaks-**279.64(b)(1) and (b)(2)**	
8.		For containers, has a secondary containment system that includes dikes, berms, or retaining walls; and a floor-**279.64(c)(1)**	
9.		Ensures secondary containment system for used oil containers is impervious-**279.64(c)(2)**	
10.		For used oil ASTs, has a secondary containment system that includes dikes, berms, or retaining walls; and a floor-**279.64(d)(1) (pre-1992 tanks) or 279.64(e)(1) (post-1992 tanks)**	
11.		Ensures secondary containment system for used oil ASTs is impervious-**279.64(d)(2) (pre-1992 tanks) or 279.54(e)(2) (post-1992 tanks)**	
12.		Labels containers and ASTs as “Used Oil”-**279.64(f)(1)**	
13.		Labels fill pipes used for underground tanks as “Used Oil”-**279.64(f)(2)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
14.		Upon detection of a release, (1) stops the release, (2) contains the release, (3) cleans up and manages the used oil and other materials, and (4) repairs or replaces the containers or tanks prior to returning them to service, if necessary-**279.64(g)(1) through (g)(4)**	
15.		Keeps a record of each used oil shipment **accepted** that includes: name and address of the (1) transporter and (2) generator; EPA ID number of the (3) transporter and (4) generator; (5) quantity of used oil; and (6) date of acceptance-**279.65(a)(1) through (a)(6)**	
16.		Keeps all records of used oil accepted for 3 years-**279.65(b)**	
17.		Prior to accepting the first shipment of off-specification used oil fuel, provides the generator, transporter, or processor or re-refiner a one-time written and signed notice certifying that (1) the burner has notified EPA of used oil management activities, and (2) the burner will burn used oil only in an industrial furnace or boiler identified in 40 CFR 279.61(a)-**279.66(a)(1) and (a)(2)**	
18.		Keeps certifications for 3 years following the last receipt of used oil from that generator-**279.66(b)**	

√ - in compliance X – not in compliance NA – not applicable

D. USED OIL FUEL MARKETERS (SUBPART H)

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Only shipped off-specification used oil to a burner who (a) has an EPA ID number and (b) burns the used oil in an industrial furnace or boiler identified in 40 CFR 279.61(a)-**279.71(a) and 71(b)**	
2.		If representing that the used oil meets fuel specifications, analyzes the used oil to determine that it meets specifications-**279.72(a)**	
3.		If representing that the used oil meets fuel specifications, maintains records of specification analysis for 3 years-**279.72(b)**	
4.		Complies with the notification requirements of RCRA Section 3010, and obtained an EPA ID number-**279.73(a)**	
5.		Keeps a record of each shipment of off-specification used oil that includes: name and address of the (1) transporter and (2) burner; EPA ID number of the (3) transporter and (4) burner; (5) quantity of used oil; and (6) date of shipment-**279.74(a)(1) through (a)(6)**	
6.		Keeps a record of each shipment of on-specification used oil that includes: (1) name and address of the burner; (2) quantity of used oil; (3) date of shipment, and (4) cross-reference to specification analysis-**279.74(b)(1) through (b)(4)**	
7.		Keeps all records of used oil shipments for 3 years-**279.74(c)**	
8.		Prior to sending the first shipment of off-specification used oil fuel, obtains from the burner a one-time written and signed notice certifying that (1) the burner has notified EPA of used oil management activities, and (2) the burner will burn used oil only in an industrial furnace or boiler identified in 40 CFR 279.61(a)-**279.75(a)(1) and (a)(2)**	
9.		Keeps certifications for 3 years following the last shipment of used oil to that burner-**279.75(b)**	

√ - in compliance X – not in compliance NA – not applicable

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APPENDIX 2-6. UNIVERSAL WASTE

A. LARGE QUANTITY HANDLER

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Has sent written notification of universal waste management to EPA-**273.32(a)(1); exception 273.32(a)(2) – previously notified of hazardous waste management activities has RCRA ID# does not require re-notification; or exception 273.32(a)(2) – notified under 40 CFR Part 165 for universal waste recalled pesticides does not require re-notification**	
2.		Has made a hazardous waste determination on any materials resulting from a release or from any materials (such as electrolytes) generated from management of universal waste-**cite 262.11 for deficiency**	
3.		Keeps universal waste pesticides in a closed container that is structurally sound, compatible with the pesticide, and lacks evidence of leakage, spillage, or damage that could cause leakage-**273.33(b)(1)**	
4.		Overpacks universal waste pesticides in noncompliant containers in a container compliant with 273.13(b)(1)-**273.33(b)(2)**	
5.		Manages universal waste pesticides in a tank that meets requirements of 40 CFR 265 Subpart J-**273.33(b)(1)**	
6.		Manages universal waste pesticides in a transport vehicle or vessel that is closed, structurally sound, compatible with the pesticide, and lacks evidence of leakage, spillage, or damage that could cause leakage-**273.33(4)**	
7.		Keeps universal waste MCE that show any evidence of leakage or other damage in a closed container that is structurally sound, compatible, and lacks evidence of leakage, spillage, or damage that could cause leakage-**273.33(c)(1)**	
8.		Removes mercury ampules from MCE only with all health and safety requirements in place-**273.33(c)(2)(i) through (2)(vi)**	
9.		Keeps mercury ampules removed from MCE (1) in closed containers, and (2) packed to prevent breakage-**273.33(c)(2)(vii) through (2)(viii)**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
10.		Keeps universal waste lamps in closed containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps-**273.33(d)(1)**	
11.		Immediately contains any universal waste lamps that show evidence of breakage-**273.33(d)(2)**	
12.		Keeps universal waste lamps that show evidence of breakage or damage in a closed container that is structurally sound, compatible, and lacks evidence of leakage, spillage, or damage that could cause leakage or release of mercury or other hazardous constituents to the environment-**273.33(d)(2)**	
13.		Labels individual batteries or their containers as "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"-**273.34(a)**	
14.		Labels recalled universal waste pesticides, containers, etc., (1) with the original product label or appropriate DOT label as identified in 49 CFR 172, and (2) as "Universal Waste- Pesticide(s)" or "Waste-Pesticide(s)"-**273.34(b)(1) and (b)(2)**	
15.		Labels individual MCE, or their containers, as "Universal Waste-Mercury Containing Equipment," or "Waste Mercury-Containing Equipment," or "Used Mercury- Containing Equipment"-**273.34(d)(1)**	
16.		Labels individual MCE thermostats, or their containers, as "Universal Waste-Mercury Thermostat(s)," or "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"-**273.34(d)(2)**	
17.		Labels containers of universal waste lamps as "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)"-**273.34(e)**	
18.		If the handler has not demonstrated that longer accumulation is necessary to facility proper treatment or disposal, does not accumulate universal waste for longer than 1 year-**273.35(a)**	
19.		Demonstrates length of time that the universal waste has been accumulated-**273.35(c)**	
20.		Trains employees responsible for management of universal waste in proper handling and emergency procedures-**273.36**	

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
21.		Immediately contains all releases of universal wastes and other residues from universal wastes-**273.37(a)**	
22.		Packages, labels, marks, and placards the waste-**279.38(c)**	
23.		Ensures that any shipments of hazardous waste to another handler have been agreed to by the receiving facility-**279.38(d)**	
24.		Maintains a record of each shipment of universal waste **received** that includes: (1) name and address of the originating entity;(2) quantity of each type of universal waste received; (3) date of receipt of the shipment- **273.39(a)(1) through (a)(3)**	
25.		Maintains a record of each shipment of universal waste **sent** from the handler that includes: (1) name and address of the receiving facility; (2) quantity of each type of universal waste sent; (3) date the shipment left the facility-**273.39(b)(1) through (b)(3)**	
26.		Keeps for 3 years shipment records of (1) waste received, and (2) waste sent-**279.39(c)(1) and (c)(2)**	

√ - in compliance X – not in compliance NA – not applicable

27. Notes/Observations:_____

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B. TRANSPORTERS (SUBPART D)

If the handler has held universal waste for longer than 10 days, all handler requirements apply.

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Has not (a) disposed of or (b) diluted, or treated universal waste, except by responding to releases-**273.51(a) and 51(b)**	
2.		Makes a hazardous waste determination on any materials resulting from a release or from any materials (such as electrolytes) generated from management of universal waste-**cite 262.11 for deficiency**	
3.		Complies with all applicable DOT regulations for any universal waste that meets the DOT definition of hazardous material-**273.52(a)**	
4.		Immediately contains all releases of universal wastes and other residues from universal wastes-**273.54(a)**	
5.		Transports universal waste only to a universal waste handler, a destination facility, or a foreign destination-**273.55(a)**	

√ - in compliance X – not in compliance NA – not applicable

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C. DESTINATION FACILITIES (SUBPART E)

#	√/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.		Complies with the notification requirements of RCRA Section 3010, and obtained an EPA ID number-**273.60(a)**	
2.		Sends universal waste only to a universal waste handler, a destination facility, or a foreign destination-**273.61(a)**	
3.		If rejecting a shipment containing universal waste, notifies the shipper of the rejection and sends the waste back to the original shipper or to another destination facility-**273.61(b)**	
4.		If receiving a shipment that contains hazardous waste that is not universal waste, notifies EPA-**273.61(c)**	
5.		Maintains a record of each shipment of universal waste **received** that includes: (1) name and address of the originating entity;(2) quantity of each type of universal waste received; (3) date of receipt of the shipment- **273.62(a)(1) through (a)(3)**	
6.		Maintains for 3 years records of receipt of shipment-**273.62(b)**	

√ - in compliance X – not in compliance NA – not applicable