

Hazardous Waste

Self-Inspection Checklist



Optional Information

Name of School:
Date of Inspection:
Career-Technical program/course/room:
Signature of inspector:

Guidelines:

This checklist covers regulations issued by the United States Environmental Protection Agency (EPA) regarding the generation, management, and disposal of hazardous wastes. Most states enforce these regulations as well as some of their own.

It is important to know that you may not be covered by federal or state regulations. Only specific waste materials, generated at one facility in specific quantities, are regulated. Lists of regulated materials, found in 40 CFR 261.31, 261.32, and 261.33, are available from your state environmental agency. Contact them for complete information for your facility.

If, after reviewing the listed sources identified above, you are unable to identify your waste, you must then determine if your waste may still be classified as hazardous waste by the Hazardous Waste Identification Questionnaire below. If you determine that you have hazardous waste, you must then determine if, as a facility, you have a regulated quantity of waste. If in a calendar month you generate or accumulate more than 100 kg (220 lb) of a hazardous waste or more than 1 kg (2.2 lb) of an acutely hazardous waste, you are a regulated generator and must obtain an EPA ID number (Form 8700-12) from the EPA.

Hazardous Waste Identification Questionnaire

Is the waste ignitable?

- The waste must be a liquid with a flash point below 140°F.
- The waste is capable of causing fire through friction, absorption, moisture or spontaneous chemical changes.
- The waste is an ignitable compressed gas.
- The waste is classified as an oxidizer by the United States Department of Transportation.



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Is the waste corrosive?

- The waste must be a liquid with a pH less than or equal to 2 or has a pH greater than or equal to 12.6.

Is the waste reactive?


- The waste is unstable and readily undergoes violent reaction without detonation.
- The waste reacts violently with water.
- The waste, when mixed with water, forms potentially explosive mixtures.
- The waste, when mixed with water, forms toxic gases or fumes.
- The waste contains cyanide or sulfides which generate toxic gases when exposed to a pH less than or equal to 2 or greater than or equal to 12.5.



Is the waste toxic?

Does the waste contain leachable levels of certain metals or chemical contaminants? This is typically determined by performing a Toxicity Characteristic Leaching Procedure or TCLP test.

Waste Handling Procedures



While waste is being held for disposal, it must be managed in accordance with state and federal regulations. It is strongly recommended that you set up a disposal procedure that takes advantage of satellite rules, since regulations governing satellite accumulations are much less burdensome. Satellite rules apply to “active drums” that are used to accumulate hazardous waste. Satellite rules can be followed as long as filled drums are transferred to an authorized accumulation area within three days. A second drum can be utilized as a satellite drum until the original drum is moved to an authorized storage area. This checklist does not address hazardous waste stored in tanks and treatment, storage and disposal (TSD) facilities.

 Questions marked with this symbol may require the help of an outside expert.

Generators of Regulated Amounts of Hazardous Waste		
1		Does the container storing hazardous waste meet US Department of Transportation container requirements? [40 CFR 262.30]
2		Is the container storing hazardous waste in good condition? [40 CFR 265.171]
3		Is the container storing hazardous waste compatible with the waste material? (For instance, solvents and paint waste should be placed in steel drums, but acidic or alkaline waste should not be placed in steel drums.) [40 CFR 265.172]
4		Is the container storing hazardous waste kept securely closed when not in use? [40 CFR 265.173a]
5		Is the container storing hazardous waste at or near the point of generation and under the operator's control? [40 CFR 262.34(c)(1)]
6		Is the container storing hazardous waste marked with the words “Hazardous Waste”? [40 CFR 262.34(a)(3)]
7		If the container is being shipped for disposal, have arrangements been made for a Licensed Treatment, Storage, and Disposal (TSD) facility to accept your hazardous wastes? [40 CFR 265.20] Note: Although the school is responsible for completing manifest forms, the TSD facility handling your waste should be consulted about completing the paperwork necessary to ship hazardous waste. [40 CFR 262.20]
8		If the container is being shipped for disposal, have arrangements with a registered Hazardous Waste Hauler been made for transport of wastes to the TSD facility? [40 CFR 262.20]
9		Have Hazardous waste manifests been completed for all shipments of hazardous wastes within your state (or other State's Manifest for shipments to other States)? [40 CFR 262.20]
10		Has a copy of the manifest with the signature of the initial transporter and date of shipment been retained by the school? [40 CFR 262.23(a)]
11		Has the Hauler been supplied with all remaining copies of the manifest? [40 CFR 262.23(b)]

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Generators of Regulated Amounts of Hazardous Waste

12		Have Land Ban forms been completed prohibiting land disposal of affected wastes unless treated below regulatory levels? [40 CFR 268.7]
13		Have appropriate markings and labels been affixed to containers prior to shipment? [40 CFR 262.31 and 262.32]
14		Has the Hauler's vehicle been inspected by the generator (or his/her designee) to ensure proper placarding before leaving the generators premises? [40 CFR 262.33]
15		Has the school kept a copy of each signed manifest for at least three years, or until a copy is received from the owner and operator of the facility which received the waste for at least three years? [40 CFR 262.40(a)]
16		Has the school prepared and submitted a copy of a Biennial Report to the EPA Regional Administrator by March 1 of each even numbered year for all hazardous waste shipped off-site for treatment, storage or disposal? [40 CFR 262.41]

Satellite Accumulation Sites


17		Is the quantity of waste less than 55 gallons or less than 1 quart for acutely toxic waste? [40 CFR 262.34(c)(1)]
18		If the quantities of hazardous waste exceed the amounts in question 17, are the containers moved within three days to a less than 90-day accumulation area or off site to an authorized facility? [40 CFR 262.34(c)(1)]

Small Quantity Generator (Generate between 100 and 1000 Kilograms of Hazardous Waste Per Month)

19		Have hazardous waste containers been accumulated at your facility for 180 days or less? [40 CFR 262.34(f)] <i>Note: If you store hazardous waste for more than 180 days, additional regulations apply which are not covered in this checklist. Contact your state environmental agency for additional information. The quantity of waste accumulated on-site may never exceed 6000 kilograms. Wastes may be stored longer than 180 days for certain situations.</i>
20		Are containers marked with accumulation start date? [40 CFR 262.34(a)(2)]
21		Are container labels visible? [40 CFR 262.34(a)(2)]
22		Are containers segregated according to waste type? [40 CFR 265.177]
23		Are the containers inspected weekly? [40 CFR 265.174]
24		Is there adequate aisle space between container rows? <i>Note: 18 inches between single stacked drums and 30 inches between double or triple stacked drums</i> [40 CFR 265.35]
25		Is there immediate access to communication or alarm systems whenever hazardous waste is poured, mixed or handled? [40 CFR 265.32 and 265.34(a)(b)]
26		Is there an adequate supply of fire extinguishers and spill control equipment in the accumulation area? [40 CFR 265.32(c)]
27		Is there adequate water pressure to supply fire hoses? [40 CFR 265.32(d)]
28		Is the fire fighting equipment, communications and alarm equipment, and decontamination equipment, spill control and water supply tested and maintained? [40 CFR 265.33]
29		Have the police, fire department and emergency response teams been familiarized with the layout of the facility? [40 CFR 265.37(a)(1)]
30		Are there written agreements with emergency response contractors and equipment suppliers? [40 CFR 265.37(a)(2)and(3)]
31		Have arrangements been made with the local hospitals to familiarize them with the properties of the hazardous waste handled at your facility and the types of injuries which may result from contact with these wastes? (This is usually a letter to the local hospitals identifying the wastes generated and the types of injuries that result from contact with the waste.) [40 CFR 265.37(a)(4)]

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Small Quantity Generator (Generate between 100 and 1000 Kilograms of Hazardous Waste Per Month)

32	Is there an emergency coordinator on-site or on call who is available to respond to an emergency? [40 CFR 262.34(d)(5)(i)] <i>Note: The emergency coordinator or his designee must respond to any emergencies that arise.</i>
33	Is the following information posted next to the telephone: the name and telephone number of the emergency coordinator; the location of fire extinguishers and spill control material, and, if present, fire alarm; and the telephone number of the fire department, unless the facility has a direct alarm? [40 CFR 262.34(d)(5)(ii)] <i>Note: In the event of a fire, explosion or other release which could threaten human health outside the facility or when the generator has knowledge that a spill has reached surface water, the generator must immediately notify the National Response Center (using their 24-hour toll free number 800-424-8802. [40 CFR 262.34(d)(5)(iv)(c)]</i>
34	Are all employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? [40 CFR 262.34(d)(5)(iii)]
35	Has the school notified the EPA Regional Administrator of any manifests which were not received for shipments made to a designated facility within 60 days? [40 CFR 262.42(b)]
36	Large Quantity Generator (Generate More Than 1000 Kilograms of Hazardous Waste Per Month) Have hazardous waste containers been accumulated at your facility for 90 days or less? [40 CFR 262.34(g)] <i>Note: If you store hazardous waste for more than 90 days, additional regulations apply which are not covered in this checklist. Contact your state environmental agency for additional information.</i>
37	Are containers marked with accumulation start date? [40 CFR 262.34(q)(4)(iii)]
38	Are container labels visible? [40 CFR 262.34(q)]
39	Are containers segregated according to waste type? [40 CFR 265.177)(a)and(c)]
40	Are the containers inspected weekly? [40 CFR 265.174]
41	Are containers of ignitable and reactive wastes located greater than 50 feet from the facility's property line? [40 CFR 265.176]
42	Is there adequate aisle space between container rows? [40 CFR 265.35]
43	Is there immediate access to communication or alarm systems whenever hazardous waste is poured, mixed or handled? [40 CFR 265.32 and 265.34(a)(1)]
44	Is there an adequate supply of fire extinguishers and spill control equipment in the accumulation area? [40 CFR 265.32(c)]
45 	Is there adequate water pressure to supply fire hoses? [40 CFR 265.32(a)(1)]
46	Is the fire fighting equipment, spill control and water supply tested and maintained? [40 CFR 265.33(a)(2)and(3)]
47	Have the police, fire department and emergency response teams been familiarized with the layout of the facility? [40 CFR 265.37(a)(1)]
48	Are there written agreements with emergency response contractors and equipment suppliers? [40 CFR 265.37(a)(2)and(3)]
49	Have arrangements been made with the local hospitals to familiarize them with the properties of the hazardous waste handled at your facility and the types of injuries which may result from contact with these wastes? (This is usually a letter to the local hospitals identifying the wastes generated and the types of injuries that result from contact with the waste.) [40 CFR 265.37(a)(4)]
50	Has a contingency plan been developed describing the actions to be taken by facility personnel in the event of a fire, explosion or hazardous materials release? [40 CFR 265.51]
51	Does the plan describe arrangements with local authorities including fire police, and emergency medical services personnel, for handling such emergencies? [40 CFR 265.52(c)]
52	Does the plan list telephone numbers for the emergency coordinator and alternates? [40 CFR 265.52(c)]
53	Does the plan list the locations and capabilities of emergency equipment kept at the school including fire extinguishers, spill control equipment and communications and alarm systems and decontamination systems? [40 CFR 265.52(e)]

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Small Quantity Generator (Generate between 100 and 1000 Kilograms of Hazardous Waste Per Month)

54	Does the plan include primary and alternate evacuation routes for students and faculty? [40 CFR 265.52(f)]
55	Is a copy of the plan available at the school for inspection? [40 CFR 265.53(a)]
56	Has a copy of the plan been forwarded to local emergency agencies including police, fire, emergency medical, the local emergency planning committee, and any emergency response contractors who may be called upon during an incident? [40 CFR 265.53(b)]
57	Are there provisions for updating the Contingency Plan as operations and/or personnel change? [40 CFR 265.54]
58	Is the training program directed by a person trained in hazardous waste management procedures? [40 CFR 264.16(a)(2)]
59	Is the training program designed to ensure that personnel are able to respond effectively? [40 CFR 264.16(a)(3)]
60	Does the training program include: [40 CFR 264.16(a)(3) (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (ii) Key parameters for automatic waste feed cut-off systems; (iii) Communications or alarm systems; (iv) Response to fires or explosions; (v) Response to ground-water contamination incidents; and (vi) Shutdown of operations.] <ol style="list-style-type: none"> 1. The use of personnel safety equipment? 2. Procedures for using facility emergency and monitoring equipment? 3. Procedures for utilizing communications or alarm systems? 4. Response procedures for fires and explosions? 5. Ground water contamination response procedures?
61	Is training provided within 6 months of the date of employment or assignment to an area involving the handling of hazardous waste? [40 CFR 264.16(b)]
62	Is training reviewed annually? [40 CFR 264.16(c)]
63	Is training documented with the following information: 1) Job title for each position and the name of the person filling each job; 2) A written job description; 3) A description of the training given; and 4) Documentation of actual training? [40 CFR 264.16(d)]
64	Are training records maintained for at least three (3) years? [40 CFR 264.16(e)]
65	Has the school contacted the transporter and/or owner or operator of the designated facility of any manifests which were not received for shipments made to a designated facility within 35 days? [40 CFR 262.42(a)(2)]
66	Has an Exception Report been submitted to the EPA regional Administrator if the generator has not received a copy of the manifest within 45 days? [40 CFR 262.42(a)(2)] <i>Note: Efforts to obtain the manifest must be documented.</i>
67	Are Biennial Reports and Exception reports kept on file for 3 years? [40 CFR 262.40(b)]