

**SMALL QUANTITY GENERATOR (SQG)
HAZARDOUS WASTE COMPLIANCE SELF-EVAULATION CHECKLIST**

Date: _____

Company Name: _____ **EPA ID#:** _____

Physical Address: _____

City: _____ **State:** _____ **Zip:** _____

Mailing Address: _____

City: _____ **State:** _____ **Zip:** _____

Company Contact: _____ **Telephone:** _____

Company Contact E-mail: _____

Business Owner: _____ **Telephone:** _____

Number of Employees: _____ **Years at Location:** _____ **Hours of Operation:** _____

Primary Products or Services: _____

Description of Hazardous Waste Generating Processes:

In the section below, please list each type of hazardous waste generated by your facility. For each waste listed, describe the waste and identify the corresponding hazardous waste code(s) (e.g., spent parts washing solvent, D001), identify the approximate quantity generated per month, and indicate whether the quantity is in gallons or pounds. Do **not** list wastes that are managed in accordance with exemptions, since those wastes do not count toward your facility’s generator status (e.g., antifreeze that is reclaimed, used oil, hazardous waste that is managed as “universal waste”). Note that hazardous waste identification is addressed by Question A-1 of the checklist.

	Waste Description & Corresponding Hazardous Waste Code(s)	Approximate Quantity Generated per Month		
		Quantity	Gallons	Pounds
1.				
2.				
3.				
4.				
5.				
6.				

This self-evaluation checklist is to be used to evaluate your facility for general compliance with the Vermont Hazardous Waste Management Regulations (VHWMR) as they apply to Small Quantity Generators (SQGs), as well as provide educational information and resources. Completion of this self-evaluation does not prove compliance with applicable regulations, nor will it serve as confirmation of compliance should a routine unannounced inspection be conducted at your facility by the Vermont Agency of Natural Resources, Hazardous Waste Program (Agency). It is up to individual businesses to ensure environmental compliance on a daily basis. If you need clarification on any of the categories or questions, please refer to the last page of the checklist for contact information.

The “**generator status**” of a facility is determined based on: 1) the total quantity (by weight) of hazardous waste generated by a facility *per month* and 2) the total amount of hazardous waste accumulated on-site at any given time.

A facility is regulated as a SQG if it generates:

- Greater than or equal to 220 pounds (100 kilograms) but less than 2,200 pounds (1,000 kilograms) of hazardous waste in a calendar month;
- Less than 2.2 pounds (1 kilogram) of acutely hazardous waste (See item A-1 of) in a calendar month;
- Less than 220 pounds of any residue or contaminated soil, waste, or other debris resulting from the cleanup of a discharge of any acutely hazardous waste in a calendar month; and
- The quantity of hazardous waste accumulated on-site never exceeds 13,200 pounds (6,000 kilograms).

If a facility generates or accumulates hazardous waste in amounts that exceed the limits specified above, it is regulated as a **Large Quantity Generator** and is subject to additional requirements.

Key Considerations when Calculating Generator Status:

- ✓ Exempt wastes don't count toward generator status.
- ✓ Generator status is based on *the amount of hazardous waste generated per month*, and not the amount of hazardous waste shipped in a particular month.
- ✓ **For Vermont-listed wastes only**, a generator can average the amount of waste generated over a six-month period and use that value when calculating generator status.

Checklist Instructions:

- Only consider your facility's last 12 months of activity when completing the checklist.
- Note that some checklist "questions" reference multiple regulatory requirements.
- Mark "**YES**" only if your facility is in compliance with all regulatory requirements referenced by a question.
- Mark "**NO**" if your facility is **not** in compliance with any requirement referenced by a question. If you mark "**NO**," please describe in the comment box at the end of each section how your facility anticipates achieving compliance with the requirement(s).
- If a question does not apply to your facility, check "**N/A**."

A	General	YES	NO	N/A
1.	Has your facility determined which wastes generated are hazardous waste? VHWMR §7-303 and §7-202			
2.	Has your facility prepared and submitted an up-to-date Vermont Hazardous Waste Handler Site ID Form? VHWMR §7-304(b)			
3.	If your facility treats or recycles hazardous waste on-site, has it submitted a " Generator Treatment " notification form to the Agency? VHWMR §7-502(o)			
4.	With the exception of hazardous waste that is treated or recycled on-site, does your facility ship all hazardous waste off-site to a permitted treatment, storage or disposal facility for proper management? VHWMR §7-309(b)(4)			
5.	Does your facility ensure that no hazardous waste (or hazardous material) is disposed of on the ground, or to surface waters, floor drains, storm drains, a sanitary sewer, or in the trash or onto the lands of the State? VHWMR §7-302(c)			
6.	Does your facility either dispose of contaminated rags or shop towels as hazardous waste or send them to a commercial laundry service? Are the rags in a container marked as "Used Rags" that is kept closed? VHWMR §7-203(w)			
<p>If you answered "NO" to any question(s) in Section A, please identify the question(s) (e.g., A.2.) and explain how your facility will achieve compliance.</p>				

B	Hazardous Waste Container Management	YES	NO	N/A
1.	Are all “ satellite accumulation ” containers of hazardous waste marked with the words “Hazardous Waste” and other words to identify the contents? VHWMR §7-310(a)(5)			
2.	Are all full containers of hazardous waste properly marked ? VHWMR §7-311(f)(1)			
3.	Are all containers of hazardous waste in good condition (not rusted, dented, bulging or leaking), and kept closed except when adding or removing waste? VHWMR §7-310(a)(2) and (4), §7-310(b)(1)(A)(ii) and (iii)			
4.	Are containers of hazardous waste compatible with the waste stored in them, and stored under cover, on an impervious surface and in a manner to prevent the waste from freezing (if applicable)? §7-311(a)(1) and (3), §7-311(f)(2) and (3)			
5.	Are incompatible wastes (e.g., acids and bases) segregated from each other? VHWMR §7-311(f)(4)(C)			
6.	Are containers of hazardous waste shipped to a designated treatment, storage, or disposal facility within 180 days of becoming full? VHWMR §7-307(c)(2)			
If you answered “NO” to any question(s) in Section B , please identify the question(s) (e.g., B.2.) and explain how your facility will achieve compliance.				

C	Hazardous Waste Short-Term Storage Area	YES	NO	N/A
1.	Does your facility maintain an inventory of all hazardous waste accumulating/stored in each short-term storage area? VHWMR §7-311(d)(1)			
2.	Does your facility conduct and record daily inspections of each short-term storage area, documenting all required items? VHWMR §7-311(d)(2)(A-E)			
3.	Is adequate aisle space (minimum of 24”) maintained between rows of hazardous waste containers to allow for unobstructed movement of personnel and emergency response equipment? VHWMR §7-311(b)(3)			
4.	Is signage posted at each short-term storage area that reads “Danger-Hazardous Waste Storage Area-Authorized Personnel Only” and, if ignitable wastes are stored, “No Smoking”? VHWMR §7-311(e) If your facility is located in a county bordering Canada, is this signage written in both English and French? VHWMR §7-311(e)			
If you answered “NO” to any question(s) in Section C , please identify the question(s) (e.g., C.2.) and explain how your facility will achieve compliance.				

D	Manifests & Land Disposal Restrictions	YES	NO	N/A
1.	Are all shipments of hazardous wastes, except shipments subject to a “tolling” agreement, sent to off-site facilities accompanied by a uniform hazardous waste manifest ? VHWMR §7-309(b)(6) and §7-702(c)			
2.	Are all hazardous waste manifests completed accurately? VHWMR §7-702(a)(1)			
3.	Does your facility assure that a completed copy of each manifest (i.e., a copy that has been completed by the generator, transporter and designated treatment, storage or disposal facility) is sent to the Agency? VHWMR §7-702(b)(10)			
4.	Have land disposal restriction (LDR) notification forms been completed for each type of hazardous waste subject to LDR requirements , and has a copy been sent to each treatment, storage or disposal facility that receives each waste? VHWMR §7-106			
5.	Are all land disposal restriction notification forms and completed copies of hazardous waste manifests retained for three (3) years? VHWMR §7-106 and §7-702(b)(5)			
<p>If you answered “NO” to any question(s) in Section D, please identify the question(s) (e.g., D.2.) and explain how your facility will achieve compliance.</p>				

E	Hazardous Waste Training and Emergency Response	YES	NO	
1.	Have all facility personnel with hazardous waste management job duties been trained to ensure they are thoroughly familiar with evacuation signals and routes, emergency response procedures, and proper waste handling procedures relevant to their job duties? VHWMR §7-307(c)(14)(C)			
2.	Has an “ emergency coordinator ” been designated for the facility <u>and</u> is he/she familiar with the responsibilities of that position? VHWMR §7-307(c)(14)(A) and (D)			
3.	Has emergency response information , including the locations of emergency response equipment and the name and phone number of the designated emergency coordinator(s), been posted in the vicinity of all short-term storage areas and locations where hazardous wastes are accumulated? VHWMR §7-307(c)(14)(B)			
4.	Does your facility maintain emergency equipment appropriate for the types of hazardous waste handled on-site? VHWMR §7-307(c)(5) and §7-309(a)(1, 2)			
5.	Have arrangements been made with local emergency response organizations to familiarize them with the layout of your facility and the types of hazardous waste handled? VHWMR §7-307(c)(5) and §7-309(a)(4)			
6.	Is your facility operated in a manner that minimizes the potential for emergencies involving hazardous waste? VHWMR §7-307(c)(5) and §7-309(a)			
<p>If you answered “NO” to any question(s) in Section E, please identify the question(s) (e.g., E.2.) and explain how and by what date your facility plans to achieve compliance.</p>				

F	Used Oil Management	YES	NO	N/A
1.	Are all containers and tanks of used oil marked with the words “Used Oil” or “Used Oil Fuel”? VHWMR §7-806(b)(5)			
2.	Are all containers of used oil in good condition (not rusted, dented, bulging or leaking), and kept closed except when adding or removing waste? VHWMR §7-806(b)(1) and (4)			
3.	Are containers of used oil stored under cover and on an impervious surface? VHWMR §7-806(b)(6) and (7)			
4.	Are used oil spills cleaned-up immediately, and is the resulting spill clean-up debris managed properly (e.g., as hazardous waste under the VT02 code)? VHWMR §7-806(e)			
5.	If used oil is stored out-of-doors in above-ground storage tanks, are those tanks equipped with secondary containment? VHWMR §7-806(d)			
6.	If used oil is burned on-site as fuel (i.e., for space heating), has your facility determined that the oil meets used oil fuel specifications (e.g., <1,000 ppm total halogens)? VHWMR §7-812(c)			
If you answered “NO” to any question(s) in Section F , please identify the question(s) (e.g., F.2.) and explain how and by what date your facility plans to achieve compliance.				

G	Universal Waste	YES	NO	N/A
1.	Does your facility manage spent lamps (e.g., fluorescent lamps), batteries, pesticides, mercury-containing thermostats / devices, PCB-containing lamp ballasts and cathode ray tubes (e.g., old style TVs, computer monitors) as either hazardous waste or universal waste instead of disposing them into the trash? VHWMR §7-901			
2.	Are all universal wastes packaged in containers that are structurally sound, marked or labeled as “Universal Waste,” and kept closed? VHWMR §7-912(d-e)			
3.	Are containers of universal waste lamps sealed with tape when full and stacked less than 5 feet high? VHWMR §7-912(d)(5)(A)(ii) and (iii)			
4.	Does your facility manage broken fluorescent lamps as hazardous waste? VHWMR §§7-912(d)(5)(B) and (C)			
5.	Are all universal wastes stored on-site for no longer than one year? VHWMR §7-912(f)			
If you answered “NO” to any question(s) in Section G , please identify the question(s) (e.g., G.2.) and explain how and by what date your facility plans to achieve compliance.				

If you have questions about items on this checklist or the underlying regulatory requirements:

- **Contact one of the following State of Vermont Programs:**

Waste Management and Prevention Division, Hazardous Waste Program (802) 828-1138

Environmental Assistance Office(800) 974-9559

Other Phone Numbers:

National Response Center.....(800) 424-8802

Vermont 24-hour Emergency Spill/Release Reporting Line (800) 641-5005

Mailing Address:

Vermont Department of Environmental Conservation
Waste Management & Prevention Division
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704