

VERMONT AGENCY OF NATURAL RESOURCES  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION, WASTE MANAGEMENT & PREVENTION DIVISION  
1 National Life Drive, Montpelier, VT 05620-3704 (802) 828-1138  
**Full CEI Checklist - SQG Hazardous Waste Generators**

<b>Facility Name:</b>	<b>Facility Address:</b>
<b>EPA ID №:</b>	<b>VT File №:</b>
<b>Facility Contact:</b>	<b>Title &amp; Telephone № :</b>
<b>Date of Last Inspection:</b>	<b>Name of Last Inspector(s):</b>

<b>Inspection Type:</b> Unannounced    Announced    Complaint    Multimedia    Other:		
<b>Time In:</b>	<b>Time Out:</b>	
<b>Number of Employees:</b>	<b>Land Owner and/or Business Owner:</b>	
<b>Date Business was Established:</b>	<b>Shifts /Day:</b>	<b>Days Per Week:</b>
<b>Other Affiliates in Vermont:</b> N/A or:	<b>Previous Names:</b> N/A or:	

***Generator Status***

**Registered:** CEG    SQG    LQG    Non-Notifier

**Observed:** CEG    SQG    LQG    Non-Generator

<b>Participants:</b>	<b>Position:</b>

*Description of Waste Streams Generated On-Site*

Description	Generation Rate (gal or lb/mo)	Disposal/Management Method & Comments

Equipment	Y/N	# of units	Size	Service Cycle
Parts Washer				
Evaporator Unit				
Oil/Water Separator				
Distillation Unit				
Paint Guns				
Used Oil Space Heater				
Other:				

Does the facility discharge to sewer or septic system?	
Does the facility have floor drains?	

<i>General</i>				
Not OK	OK	N/A	UNK	
				Did the generator make a hazardous waste determination for all waste generated? 7-303
				Are test results maintained for three years after final disposal offsite for any hazard determination? 7 710(a)(2)
				Did the generator file a Hazardous Waste Handler Site ID form? 7 304(a)
				Is the Hazardous Waste Handler Site ID form up-to-date and accurately describes current waste activity and waste generation? 7 304(b)
				Has the generator reported all reportable discharges/releases of a hazardous waste or a hazardous material immediately by phone and written within 10 days? 7-105(a)(2)
				Has the generator registered with the secretary and renewed the registration annually? 7-307(c)(11)
<b>Comments/Notes:</b>				

<i>Manifests</i>				
Not OK	OK	N/A	UNK	
				Did the generator use the appropriate Uniform Hazardous Waste Manifest? 7-702(a)(1)
				Is the receiving facility designated on each manifest? 7 702(b)(1)
				Is the transporter's name, signature and date of acceptance on the manifest? 7 702(b)(2)
				Is hazardous waste offered for shipment to transporters and TSDFs with EPA ID numbers? 7 309(b)(2)
				Did the generator complete the generators portion of the manifest before offering the waste for shipment? 7 309(b)(6)
				Did the generator sign and date the manifest? 7 702(b)(4)
				If the waste is not considered hazardous in the disposal state, does the generator have that state's authorization to receive the waste? 7 309(b)(5)(B)
				Are all signed copies of the manifests retained for at least 3 years? 7 702(b)(5)
				Have completed copies arrived within 35 days from the facility or 60 days from the consignee? 7 702(b)(9) If NO, see Exception Reports, page 6.
				Did the generator immediately send a copy to the Secretary? 7 702(b)(10)
				Are manifests for hazardous wastes that are subject to LDR accompanied by proper paperwork? 7 106(a)

Comments/Notes:

**Exports**

Not OK	OK	N/A	UNK	
				Did the generator notify the EPA 60 days before the export of a hazardous waste? 7-705(b)(1)
				Did the notification include the generator's name, mailing address, telephone number and EPA ID number? 7-705(b)(1)(A)
<b>Did the notification include, by consignee, for each hazardous waste type:</b>				
				A description of each hazardous waste with EPA hazardous waste code, DOT shipping name, hazard class, and DOT ID No (UN/NA)? 7-705(b)(1)(B)(i)
				The frequency or rate and period of time for waste to be exported? 7-705(b)(1)(B)(ii)
				The estimated total quantity of waste? 7-705(b)(1)(B)(iii)
				All points of entry and departure the waste will pass? 7-705(b)(1)(B)(iv)
				A description of the means by which each shipment of waste will be transported (e.g., mode of transportation, type of containers)? 7-705(b)(1)(B)(v)
				A description of the manner in which the hazardous waste will be treated, stored or disposed of in the receiving country? 7-705(b)(1)(B)(vi)
				The name and site address of the consignee and any alternate consignee? 7-705(b)(1)(B)(vii)
				The name of any transit countries through which the waste will be sent, the length of time, and the nature of waste handling during such transit? 7-705(b)(1)(B)(viii)
				Was a notification sent to the EPA's Office of Enforcement and Compliance Assurance; Office of Compliance, Enforcement Planning, Targeting and Data Division? 7-705(b)(2)
				Has the receiving country consented to accept the waste? 7-705(a)(2)
				Did a copy of the EPA "Acknowledgment of Consent" accompany the shipments? 7-705(a)(3)
				Are copies of each notification of intent to export kept for 3 years? 7-710(d)(1)
				Are copies of the EPA Acknowledgment of Consent kept for 3 years? 7-710(d)(2)
				Are completed manifests from consignee kept for 3 years? 7-710(d)(3)

Comments/Notes:

***Exception Reports***

Not OK	OK	N/A	UNK	<b>Has an exception report been filled for:</b>
				No completed copy of the manifest from a TSD within 35 days? 7-707(a)(1)
				No manifest copy from a foreign consignee within 60 days? 7-707(a)(2)
				No completed copy of the exported manifest within 90 days? 7-707(c)(2)
				For waste returned to the United States? 7-707(c)(3)
				Are exception reports kept on file for 3 years? 7-710(a)(1)

Comments/Notes:

***Preparedness & Prevention***

Not OK	OK	N/A	UNK	
				Is the facility maintained and operated to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, groundwater, or surface water which could threaten human health or the environment? 7-309(a)
<b>Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:</b>				
				An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel? 7-309(a)(1)(A)
				A device, such as a telephone, immediately available at the scene of operations, or a hand held two-way radio, capable of summoning emergency assistance from local police departments, fire departments or state or local emergency response teams? 7-309(a)(1)(B)
				Portable fire extinguishers, fire control equipment (including special extinguishing equipment such as that using foam, inert gas or dry chemicals), spill control equipment and decontamination equipment? 7-309(a)(1)(C)
				Water at adequate volume and pressure to supply water hose streams or foam producing equipment, or automatic sprinklers or water spray systems? 7-309(a)(1)(D)

Not OK	OK	N/A	UNK	
				Is all emergency equipment tested and maintained as necessary to assure its proper operation in time of emergency? 7-309(a)(2)
				When handling hazardous waste, do personnel have immediate access to an internal alarm or emergency communication device (unless such a device is not required)? 7-309(a)(3)(A)
				If there is ever just one employee on the premises while the facility is operating, does that employee have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance? 7-309(a)(3)(B)
<b>Did the generator make the following arrangements with local authorities:</b>				
				Familiarize emergency response teams and police with the layout of the facility, properties of hazardous waste handled and evacuation routes? 7-309(a)(4)(A)
				Designate primary emergency authority to a specific police department and a specific fire department? 7-309(a)(4)(B)
				Agreements with emergency response teams, emergency response contractors and equipment suppliers? 7-309(a)(4)(C)
				Familiarize local hospitals with the hazardous waste handled at the facility and the types of injuries or illnesses which could result from an emergency? 7-309(a)(4)(D)
<b>Comments/Notes:</b>				
<b><i>Emergency Planning/Employee Training</i></b>				
Not OK	OK	N/A	UNK	
				At all times, is an emergency coordinator either on the premises or on call? 7-307(c)(14)(A)
<b>In an emergency situation, does the emergency coordinator know to do the following:</b>				
				In the event of a fire, call the fire department or use a fire extinguisher? 7-307(c)(14)(D)(i)
				In the event of a release/discharge, comply with emergency actions in 7-105? 7-307(c)(14)(D)(ii)
				If a release has occurred, identify the source, character, amount and extent of any released materials by record review or chemical analysis? 7-307(c)(14)(D)(iii)
				Is each employee familiar with the emergency procedures, proper waste handling and evacuation signals/routes relevant to their responsibilities? 7-307(c)(14)(C)

Comments/Notes:

**Waste Accumulation and Storage-General**

Not OK	OK	N/A	UNK	
				Has the generator avoided disposing of hazardous waste by evaporation? 7-302(a)
				Has the generator not diluted hazardous waste? 7-302(b)
				Has the generator avoided an unpermitted release of a hazardous material to the waters or land? 7-302(c)
NO	YES			Are tanks used to store hazardous waste? If tanks are on site and if LQG, fill out Tank Checklist (the long one) and AA, BB, CC checklists, as applicable.
				Are tanks marked with the words "Hazardous Waste" and are the contents of the tank identified? 7-311(g)(1)
NO	YES			Is the generator placing hazardous wastes on Drip Pads or in Containment Buildings?(If yes, refer to 40 CFR Part 265 Subparts W and DD and Sections 262.34(a)(1)(iii) and (iv) for requirements) 7-311(h)

Comments/Notes:

**Satellite Accumulation**

Not OK	OK	N/A	UNK	<b>Does accumulation of hazardous waste in non-storage area(s) meet the following VHWMR requirements:</b>
				For each wastestream, is the generator accumulating less than one cubic yard of VT-listed non-liquid hazardous waste, or one quart of acutely hazardous waste, or 55 gallons of any other hazardous waste? 7-310(a)
				For each wastestream, is the generator accumulating waste in containers at or near any point of generation? 7-310(a)
				For each wastestream, is the generator accumulating waste under the control of the operator of the process generating the waste? 7-310(a)
				Are the waste and the container chemically compatible such that no leakage occurs? 7-310(a)(1)
				Is the container in good condition? 7-310(a)(2)
				Is the container located within a structure that sheds rain and snow and on an impervious surface? 7-310(a)(3)



Not OK	OK	N/A	UNK	<b>Short-Term Storage Area – Design and Operating Standards</b>
				Impervious storage surface? 7-311(a)(1)
				In a structure that sheds snow and ice? 7-311(a)(2)
				Preventive measures for storage of freezable hazardous waste? 7-311(a)(3)
				Is spill or fire control equipment required under <b>7-309(a)(1)(A)</b> available in the vicinity of each short-term storage area? 7-311(a)(4)
				Are containers or tanks holding incompatible hazardous wastes segregated or stored in a separate enclosure 7-311(b)(1)
				Is hazardous waste labeling visible on all containers? 7-311(b)(2)
				Is aisle space <b>at least</b> 24 inches? 7-311(b)(3)
<b>Short-Term Storage Area - Security</b>				
				Is there a warning sign posted at each storage area? 7-311(e)(1)
				Is a "No Smoking" sign posted for ignitable wastes in storage? 7-311(e)(2)
				Are the signs visible from 25 feet? 7-311(e)(1)
				For facilities bordering the province of Quebec, are the signs written in both English and French? 7-311(e)(1)
<b>Is the following information next to each telephone in the vicinity of where hazardous wastes are managed?</b>				
				The name and telephone numbers (office and home) of the emergency coordinator(s)? 7-307(c)(14)(B)(i)
				Location of fire extinguishers and spill control material, and, if present, fire alarm? 7-307(c)(14)(B)(ii)
				The telephone number of the fire department (unless the facility has a direct alarm)? 7-307(c)(14)(B)(iii)
<b>Short-Term Storage Area – Containers</b>				
<b>Are containers used for short-term storage clearly labeled with the following:</b>				
				Generator's name, address and EPA ID AND "Hazardous Waste - Federal Law Prohibits..." language? 7-311(f)(1)(A)
				Name and hazardous waste ID number of the waste in the container? 7-311(f)(1)(B)
				Date when the container was first used to accumulate or store hazardous waste? 7-311(f)(1)(C)
				"Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the EPA" language? 7-311(f)(1)(D)
				Is the container holding the waste closed except to add or remove waste? 7-311(f)(4)(A)
				Are any containers holding hazardous waste not opened, handled or stored in a manner which may rupture the container or cause it to leak? 7-311(f)(4)(B)

Not OK	OK	N/A	UNK	
				Has the generator avoided placing incompatible wastes/materials into the same container? 7-311(f)(4)(C)(i)
				Has the generator avoided placing waste into an unwashed container that previously held an incompatible waste or material? 7-311(f)(4)(C)(ii)
				Are all containers holding ignitable or reactive waste located at least 50 feet from the property line? 7-311(f)(6)
<b>Short - Term Storage Area – Inventory &amp; Inspection</b>				
				Is a current hazardous waste inventory maintained at a location apart from the short term storage area? 3-11(d)(1)
				Are daily inspections conducted at each short-term storage area? 7-311(d)(2)
				Are daily inspection records kept for at least 3 years? 7-311(d)(2)
				Is a current inspection checklist maintained for each storage area? 7-311(d)(2)
Who performs the daily STSA inspections? _____				
<b>Does the daily inspection checklist contain the following items:</b>				
				Condition of Drums? 7-311(d)(2)(A)
				Safety and Emergency Equipment? 7-311(d)(2)(B)
				Aisle Space? 7-311(d)(2)(C)
				Problems Encountered/Corrective Actions? 7-311(d)(2)(D)
				Date of Inspection/Inspector's Signature? 7-311(d)(2)(E)
(See Wastes in Storage Worksheet to list containers in short-term storage)				
Comments/Notes:				
<b>Universal Waste</b>				
What does the facility do with Universal Waste? _____				
				<b>Universal Waste Lamps</b>
				Are universal waste lamps packaged in containers that are structurally sound to prevent breakage and kept closed? 7-912(d)(5)(A)(i)
				Are full containers sealed with tape? 7-912(d)(5)(A)(ii)
				Are containers of lamps stacked no higher than 5 feet? 7-912(d)(5)(A)(iii)

Not OK	OK	N/A	UNK	
				Are containers holding universal waste lamps marked as "Universal Waste-Lamps", "Waste Lamps" or "Used Lamps"? 7-912(e)(6)
				Can the universal waste handler demonstrate accumulation/storage for less than one year? 7-912(f)(3)
				Are all employees familiar with proper handling and emergency procedures? 7-912(g)
<b>Mercury-Containing Devices</b>				
				Are mercury containing devices packaged in containers that are structurally sound to prevent breakage and kept closed? 7-912(d)(6)(A)
				Are containers holding mercury-containing devices marked as "Universal Waste-Mercury Device(s)", "Waste Mercury Device(s)" or "Used Mercury Device(s)"? 7-912(e)(7)
				Can the universal waste handler demonstrate accumulation/storage for less than one year? 7-912(f)(3)
<b>Light Ballasts</b>				
				Are PCB-containing fluorescent light ballasts managed to prevent releases to the environment? 7-912(d)(4)
				Are PCB-containing fluorescent light ballasts, or their containers, marked as "Universal Waste- PCB Ballast(s)", "Waste PCB Ballast(s)", or "Used PCB Ballast(s)"? 7-912(e)(5)
				Can the universal waste handler demonstrate accumulation/storage for less than one year? 7-912(f)(3)
<b>Cathode Ray Tubes (CRTs)</b>				
				Are CRTs packaged to prevent breakage during storage, handling and transportation? 7-912(d)(7)
				Are CRTs, or their containers, marked as "Universal Waste- Cathode Ray Tube(s)", "Waste Cathode Ray Tube(s)", or "Used Cathode Ray Tube(s)", "Universal Waste-CRT(s)", "Waste CRT(s)" or "Used CRT(s)"? 7-912(e)(8)
				Can the universal waste handler demonstrate accumulation/storage for less than one year? 7-912(f)(3)
<b>Comments/Notes:</b>				
<b>Used Oil</b>				
What does the facility do with used oil? _____				
Not OK	OK	N/A	UNK	
				Has the facility tested used oil? 7-812(c)(1)

Not OK	OK	N/A	UNK	
				Are containers of used oil closed when not adding or removing waste? 7-806(b)(1)
				Are containers holding used oil handled or stored in a manner that may rupture the container or cause a release? 7-806(b)(2)
				Are containers holding used oil lined with materials which will not react with and are otherwise compatible with used oil? 7-806(b)(3)
				Are containers holding used oil in good condition? 7-806(b)(4)
				Are containers holding used oil marked with the words "used oil?" 7-806(b)(5)
				Are containers holding used oil stored on an impervious surface? 7-806(b)(6)
				Are containers of used oil protected from rain or snow? 7-806(b)(7)
				Are containers of used oil and water protected from freezing? 7-806(b)(8)
				Are above-ground storage tanks holding used oil marked with the words "used oil?" 7-806(d)(2)
				Are above-ground storage tanks that are located out-of-doors equipped with secondary containment? 7-806(d)(4)

Comments/Notes:

***Conditional Exemptions***

YES		NO		
Not OK	OK	N/A	UNK	
				Are used rags picked up and cleaned by a commercial laundering service? If yes, name of service? _____
				Are containers holding rags marked as "Destined for Laundering"? 7-203(w)(3)(A)
				Are the used rag containers kept closed and in good condition? 7-203(w)(3)(B)
				Are the used rag containers stored on an impervious surface and protected from rain and snow? 7-203(w)(3)(D)
				Are containers holding reusable absorbent material (contaminated with used oil) marked with words to identify the contents? 7-203(x)(2)(A)
				Are containers of reusable absorbent kept closed, except to add or remove waste? 7-203(x)(2)(B)
				Are containers of reusable absorbent in good condition? 7-203(x)(2)(C)
				Are containers of reusable absorbent stored on an impervious surface and protected from rain and snow? 7-203(x)(2)(D)
				Are spent lead acid batteries being stored undercover and on an impervious surface? 7-204(f)(1)

Location batteries are recycled at:

Comments/Notes:

**SUMMARY** Comments or concerns (unless documented on Closing Conference Log):

**Material provided during the inspection:**