

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

| | |
|-----------------------|--------------------------|
| Facility Name: | Facility Address: |
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|------------------|
| EPA ID №: |
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|--------------------------|---|
| Facility Contact: | Facility Contact Title & Telephone № : |
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|---------------------------------|-----------------------------------|
| Date of Last Inspection: | Name of Last Inspector(s): |
|---------------------------------|-----------------------------------|

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|-------------------------|
| Inspection Type: |
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| | |
|-----------------|------------------|
| Time In: | Time Out: |
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| | |
|----------------------------|------------------------------|
| Date of Inspection: | Name of Inspector(s): |
|----------------------------|------------------------------|

| | |
|-----------------------------|--|
| Number of Employees: | Land Owner and/or Business Owner: |
|-----------------------------|--|

| | | |
|---------------------------------------|--------------------|-----------------------|
| Date Business was Established: | Shifts/Day: | Days Per Week: |
|---------------------------------------|--------------------|-----------------------|

| | |
|-------------------------------------|------------------------|
| Other Affiliates in Vermont: | Previous Names: |
|-------------------------------------|------------------------|

| | |
|-------------------------|--|
| <i>Generator Status</i> | |
| Registered: | |
| Observed: | |

| | |
|----------------------|------------------|
| Participants: | Position: |
| | |
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| | |
| | |

Description of Waste Streams Generated On-Site

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

Total Hazardous Waste Generation Rate (approx): _____ pounds/month

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

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|--|-----------|------------|------------|---|
| Does the facility discharge to sewer or septic system? | | | | |
| Does the facility have floor drains? | | | | |
| General SQG Requirements | | | | |
| Not OK | OK | N/A | UNK | |
| | | | | Has the generator renewed their registration and paid the applicable annual fees? 7-304(e) |
| | | | | 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 correctly determined their waste generator category? 7-305 |
| | | | | Has the generator made an accurate determination as to whether the waste is hazardous? 7-307(c)(1) |
| | | | | Has the generator kept records supporting hazardous waste determinations? 7-307(c)(1) |
| | | | | If the waste was determined to be hazardous, has the generator identified all applicable EPA and VT hazardous waste codes? 7-202(c) |
| | | | | Has the generator avoided evaporating hazardous waste? 7-302(a) |
| | | | | Has the generator avoided diluting hazardous waste? 7-302(b) |
| | | | | For healthcare facilities: has the generator determined whether it is subject to VHWMR subchapter 10 for the management of hazardous waste pharmaceuticals? 7-301(f) |
| | | | | Has the generator avoided releasing hazardous materials into surface or groundwater or onto land? 7-302(c) |
| | | | | Has the generator experienced an episodic event and did they follow appropriate notification procedures? 7-307(e) |
| Manifests and Exception Reports | | | | |
| Not OK | OK | N/A | UNK | |
| YES | | NO | | Is the generator registered for a RCRAinfo Industry account? |
| YES | | NO | | Is the generator using eManifest for electronic record keeping? |
| | | | | Did the generator use the appropriate Uniform Hazardous Waste Manifest? 7-702(a)(1) |
| | | | | Is the generator using the EPA identification number that is assigned to the generator site at the time of shipment? 7 702(b)(1) |
| | | | | Did the generator ensure that all hazardous waste codes used on the manifest are the same codes identified on the waste profile? 7-702(b)(2) |
| | | | | Is the designated facility permitted to receive the waste indicated on the manifest? 7 702(b)(3) |
| | | | | Did the generator sign and certify the manifest? 7 702(b)(4) |
| | | | | Are all signed copies of the manifests retained for at least 3 years? 7 702(b)(7) |
| | | | | If generator did not receive a completed manifest copy within 35 days of initial shipments, did the generator take action to locate the manifest? 7 707(a)(1) |
| | | | | If the completed manifest has not been received within 45 days of initial shipment, did the generator submit an exception report, as required? 7-707(b) (Review Exception Report requirements, if applicable) |
| | | | | Are manifests for hazardous wastes that are subject to LDR accompanied by proper paperwork? 7 106(a) |
| YES | | NO | | Does the generator export any of its hazardous waste? (if yes, review export requirements) |

Emergency Preparedness & Prevention for SQGs

| Not OK | OK | N/A | UNK | |
|--------|----|-----|-----|---|
| | | | | Did the facility designate at least one emergency coordinator, and at all times, is this individual either on the premises or on call? 7-307(c)(13)(A) |
| | | | | Did the generator post the following information next to telephones or in areas directly involved in the generation and short-term storage of hazardous waste: the name and telephone numbers of the emergency coordinator(s)? 7-307(c)(14)(B)(i) |
| | | | | Did the generator post the following information next to telephones or in areas directly involved in the generation and short-term storage of hazardous waste: location of fire extinguishers and spill control material, and, if present, fire alarm? 7-307(c)(14)(B)(ii) |
| | | | | Did the generator post the following information next to telephones or in areas directly involved in the generation and short-term storage of hazardous waste: the telephone number of the fire department, unless the facility has a direct alarm? 7-307(c)(14)(B)(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) |
| | | | | 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) |
| | | | | Is the facility equipped with the following (if applicable): |
| | | | | 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) |
| | | | | 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) |
| | | | | Did the generator make the following arrangements with local authorities: |
| | | | | Determine the potential need for the services of the local police department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals? 7-309(a)(4)(A)(i) |
| | | | | Familiarize local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals with the types and quantities of hazardous wastes handled at the facility, layout of the facility, evacuation routes and types of injuries that may result from incidents? 7-309(a)(4)(A)(ii) |

| Not OK | OK | N/A | UNK | |
|---|----|-----|-----|--|
| | | | | Is the generator maintaining records documenting that arrangements have been made? |
| | | | | Is the generator maintaining aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes? 7-309(a)(5) |
| WASTE ACCUMULATION AND STORAGE- CONTAINER MANAGEMENT | | | | |
| <i>Waste Accumulation and Storage-General</i> | | | | |
| Not OK | OK | N/A | UNK | |
| | | | | Is waste stored on-site for less than 180 days? 7-307(c)(2) |
| | | | | Does the facility generate less than 2,200 lbs. of hazardous waste or 2.2 lbs. of acutely hazardous waste in a calendar month? 7-307(b) |
| | | | | Is total amount of waste accumulated on site less than 13,200 pounds (6000 Kg)? 7-307(b) |
| <i>Satellite Accumulation</i> | | | | |
| Not OK | OK | N/A | UNK | Does accumulation of hazardous waste in non-storage area(s) meet the following VHWMR requirements: |
| | | | | 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)(1) |
| | | | | For each wastestream, is the generator accumulating waste in containers at or near any point of generation? 7-310(a)(1) |
| | | | | For each wastestream, is the generator accumulating waste under the control of the operator of the process generating the waste? 7-310(a)(1) |
| | | | | Are the waste and the container chemically compatible such that no leakage occurs? 7-310(a)(1)(A) |
| | | | | Is the satellite accumulation container in good condition? 7-310(a)(1)(B) |
| | | | | Is the container located within a structure that sheds rain and snow and on an impervious surface? 7-310(a)(1)(C) |
| | | | | Is the container holding the waste closed except to add or remove waste? 7-310(a)(1)(D) |
| | | | | Is the container marked with the words "Hazardous Waste" ? 7-310(a)(1)(E)(i) |
| | | | | Is the container marked with the indication of the hazards of the contents? 7-310(a)(1)(E)(ii) |
| | | | | Is there adequate aisle space between rows of containers to not obstruct movement of personnel and equipment, and are containers handled in a way to prevent rupture or leakage? 7-310(a)(1)(F) |
| | | | | Are full satellite containers dated upon becoming full? 7-310(a)(1)(G)(i) |
| | | | | Are full satellite containers dated and moved to a short-term storage area within three days of becoming full? 7-310(a)(G)(ii) |
| | | | | Is only one accumulation container per process wastestream being used to accumulate waste? 7-310(c) |

| Accumulation in Short-Term Storage Area Requirements | | | | |
|---|-----------|------------|------------|--|
| Not OK | OK | N/A | UNK | |
| | | | | 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 in a short-term storage area? 7-310(b) |
| | | | | If accumulating waste in short term storage area, is the waste brought directly from the point of generation to the storage area by a trained employee at the end of each work shift (< 12 hours)? 7-310(b)(1) |
| | | | | Is the shift accumulation container chemically compatible with any accumulated waste? 7-310(b)(1)(A)(i) |
| | | | | Is the shift accumulation container in good condition? 7-310(b)(1)(A)(ii) |
| | | | | Is the shift accumulation container kept closed except to add or remove waste? 7-310(b)(1)(A)(iii) |
| | | | | Is the shift accumulation container marked or labelled as "hazardous waste" and other words that ID the contents? 7-310(b)(1)(A)(iv) |
| | | | | For accumulation containers in STSA: is the accumulation container managed in accordance with the short-term storage area requirements of Section 7-311? 7-310(b)(2)(A) |
| | | | | Is each accumulation container in the STSA marked to indicate that it is an accumulation container and as to its point of generation? 7-310(b)(2)(B) |
| | | | | For each accumulation container in STSA that becomes full with the amounts specified in 7-310(b), has the generator labeled the container with the date it reached the specified limit? 7-310(b)(2)(C) |
| | | | | Is only one accumulation container per process wastestream being used to accumulate waste either in a satellite OR short-term storage areas? 7-310(c) |
| Short-Term Storage Area | | | | |
| How many STSAs are there? <input style="width: 150px; height: 20px;" type="text"/> | | | | |
| Location of HW Storage Area(s): | | | | |
| Indoors: | | | | |
| Outdoors: | | | | |
| Short-Term Storage Area - Design and Operating Standards | | | | |
| Not OK | OK | N/A | UNK | |
| | | | | 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 7-309(a)(1)(A) 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 at least 24 inches? 7-311(b)(3) |
| Short-Term Storage Area - Security | | | | |
| | | | | 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) |

| Short-Term Storage Area – Containers | | | | |
|---|-----------|------------|------------|--|
| Not OK | OK | N/A | UNK | Are containers used for short-term storage clearly labeled with the following: |
| | | | | Labeled with the words "Hazardous Waste"? 7-311(f)(1)(A) |
| | | | | An indication of the hazards of the contents? 7-311(f)(1)(B) |
| | | | | Date when the container was first used to accumulate or store hazardous waste? 7-311(f)(1)(C) |
| | | | | 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) |
| | | | | 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)(A) |
| Short-Term Storage Area - Inventory & Inspection | | | | |
| Not OK | OK | N/A | UNK | |
| | | | | Is a current hazardous waste inventory maintained at a location apart from the short term storage area? 7-311(d)(1) |
| | | | | Are weekly inspections conducted at each short-term storage area? 7-311(d)(2) |
| | | | | Are 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 inspections? _____ | | | | |
| | | | | Does the inspection checklist contain the following items: |
| | | | | 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) |
| Universal Waste | | | | |
| What does the facility do with universal waste? _____ | | | | |
| Not OK | OK | N/A | UNK | General Requirements |
| | | | | Has the generator avoided disposing of universal waste? 7-912(b)(1) |
| | | | | Can the universal waste handler demonstrate accumulation/storage for less than one year? 7-912(f)(3) |
| | | | | Are all employees familiar with proper handling of universal waste and emergency procedures? 7-912(g) |
| Not OK | OK | N/A | UNK | Universal Waste Lamps |
| | | | | Are universal waste lamps packaged in containers that are structurally sound to prevent breakage and kept closed? 7-912(d)(5)(A)(i) |
| | | | | Are containers of universal waste lamps stored within a structure such that the containers are protected from precipitation? 7-912(d)(5)(A)(ii) |
| | | | | Are full containers sealed with tape? 7-912(d)(5)(A)(iii) |

| Not OK | OK | N/A | UNK | |
|---|----|-----|-----|---|
| | | | | Are containers of lamps stacked no higher than 5 feet? 7-912(d)(5)(A)(iv) |
| | | | | Has the generator contained and transferred broken or damaged lamps and all residue to an appropriate container? 7-912(d)(5)(A)(v) |
| | | | | Has the generator made a hazardous waste determination on the residue of broken and damaged lamps? 7-912(d)(5)(B) |
| | | | | Are containers holding universal waste lamps marked as "Universal Waste-Lamps", "Waste Lamps" or "Used Lamps"? 7-912(e)(6) |
| Mercury-Containing Devices | | | | |
| Not OK | OK | N/A | UNK | |
| | | | | 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) |
| Post Consumer Paint | | | | |
| Not OK | OK | N/A | UNK | |
| | | | | Is waste postconsumer paint packaged in containers that remain closed, structurally sound, and compatible with the postconsumer paint? 7-912(d)(8)(A) |
| | | | | Are containers of waste postconsumer paint stored within a structure such that the containers are protected from precipitation? 7-912(d)(8)(C) |
| | | | | Are containers holding post consumer paint marked as "Waste Paint", "Used Paint" or "Universal Waste Paint"? 7-912(e)(9) |
| Post Consumer Paint | | | | |
| Not OK | OK | N/A | UNK | |
| | | | | Are waste aerosol cans accumulated in a container that is structurally sound, compatible with the contents of the aerosol cans and is protected from sources of heat? 7-912(d)(9)(A) |
| | | | | If puncturing and draining aerosol cans, is the generator using a device specifically designed to safely puncture aerosol cans and effectively contain the residual contents and any emissions thereof? 7-912(d)(9)(D)(i) |
| | | | | If puncturing and draining, did generator conduct a hazardous waste determination on the contents of the emptied aerosol cans? 7-912(d)(9)(D)(v) |
| | | | | Are containers holding waste aerosol cans marked as "Waste Aerosol Cans", "Used Aerosol Cans" or "Universal Waste - Aerosol Cans"? 7-912(e)(10) |
| Used Oil | | | | |
| What does the facility do with used oil? | | | | |
| Not OK | OK | N/A | UNK | |
| | | | | Has the facility tested used oil? 7-812(c)(1) |
| | | | | Are containers of used oil closed when not adding or removing waste? 7-806(b)(1) |

| Not OK | OK | N/A | UNK | |
|---|----|-----------|-----|--|
| | | | | 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) |
| Conditional and Recycling Exemptions | | | | |
| YES | | NO | | Are wipes picked up and cleaned by a commercial laundering service? |
| | | | | If Yes, name of service? |
| Not OK | OK | N/A | UNK | |
| | | | | Are containers holding water-miscible fluids in good condition, kept closed, marked with words that identify the contents, and stored on impervious surface? 7-203(l)(2) |
| | | | | Have used oil filters been drained using an approved method? 7-203(o)(1) |
| | | | | Are containers holding wipes for laundering labeled as " Excluded wipes"? 7-203(w) |
| | | | | Are wipes for laundering stored in non-leaking and closed containers? 7-203(w) |
| | | | | Is oil-contaminated absorbent material that is processed and reused on-site stored in closed and labeled containers and on an impervious surface? 7-203(x) |
| | | | | Are lead-acid batteries being stored on an impervious surface and kept undercover? 7-204(f)(1) |
| | | | | Are containers of antifreeze for recycling appropriately labeled and kept closed except when adding or removing waste? 7-204(i) |
| | | | | Are containers of antifreeze for recycling in good condition and stored on an impervious surface and protected from rain and snow? 7-204(i) |
| | | | | Location batteries are recycled at: |
| | | | | |