

HAZARDOUS WASTE INSPECTION CHECKLIST - GENERATORS

Inspector(s): _____ Date: _____

Inspection Type: initial complaint other _____

■ **GENERATOR INFORMATION** VT "Genclass" ID N^o: ____-____-____-____ // none

Facility Name: _____ Location: _____

Mailing Address: see multi-media (mm) checklist // OR: _____

Directions: see mm checklist // OR: _____

Contact(s)/Title(s): see mm checklist // OR: _____

Phone N^o: see mm checklist // OR: _____ SIC Code(s): _____

EPA ID N^o: VT ____-____-____-____ // Not on RCRIS

Generator Status: Registered: CEG SQG LQG not on RCRIS

Observed: CEG SQG LQG Non-generator

Company Size: ____ 1-9 employees ____ 10-49 employees ____ 50-99 employees ____ 100+ employees

Does this company have other facilities or affiliates in Vermont? ____ Yes ____ No

If yes to above, please list names and locations: _____

■ **SITE LOCATION INFORMATION** (If not already in the file, please attach map with site identified)

Closest Intersection or Landmark to Site: _____

Miles from intersection/landmark identified above: ____ Miles, to: _____ (approx. compass direction)

Geographic Coordinates (if GPS data collected): Latitude ____° ____' ____" N / Longitude ____° ____' ____" W

■ **SITE HISTORY**

Date Current Use Established at this Location: _____

Previous site uses/Names of operation since 1980: N/A or: _____

List any known environmental permits, violations or investigations associated with this site: _____

Has this site ever been visited by the WMD? ____ Yes ____ No

If yes to above, indicate date: _____ and inspector: _____

Hazardous waste transporters: _____

Consultants: _____

Time Arrived _____ Walk-Through _____ Short-term Storage _____

Record Review _____ Closing Conference _____ Time Departed _____

■ **CURRENT PROCESS INFORMATION**

Product(s): _____

Primary Processes (e.g.: cutting, grinding): _____

Process Description: _____

Notes: _____

Description of Waste Streams Generated On-Site			
	Description	Generation Rate (gal or lb/mo)	Disposal/Management Method & Comments
	Dry cleaning solvents/sludges and lint <input type="checkbox"/> perc <input type="checkbox"/> stoddard <input type="checkbox"/> CFCs <input type="checkbox"/> _____		
	Dry clean filters (<input type="checkbox"/> cartridge <input type="checkbox"/> spin disk)		
	Dry cleaning waste water		
	Waste oils {NOTE: exempt if managed per Subchapter 8}		
	Used absorbents ("speedi-dry," booms, etc);		
	Reuseable absorbents (e.g., rags) {exempt if managed per § 7-203(x)}		
	Parts washing wastes/sludges		
	Antifreeze {exempt if recycled, per § 7-203(m)}		
	Tank bottom wastes		
	Paints/lacquers/thinners		
	Photographic/X-ray developing wastes {silver-bearing waste is exempt if recycled per § 7-204(g)}		Silver recovered <input type="checkbox"/> on-site <input type="checkbox"/> off-site Other:
	PCBs (>50 parts per million)		
	Electroplating wastes		
	Pesticides; Herbicides		
	Strong acids/bases (HW if pH ≤ 2 or ≥ 12.5; or, if solid or gaseous, a mixture with distilled water has those pHs)		
	Spent solvents/degreasers; still bottoms		
	Water-miscible fluids {exempt if recycled per 7-203(l)}		
	Oil filters {exempt if managed per § 7-203(o)}		
	Printing wastes (e.g., waste inks, blanket wash)		
	Ignitable wastes (flashpoint <140° F)		
	Other:		
	Other:		

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

■ **RECORD REVIEW**

General

- | | | |
|--------------|---|-----------------|
| §7-303 | Did the generator make a hazardous waste determination for all waste generated? | Y___ N___ NA___ |
| §7-710(a)(2) | Are test results maintained for 3 years after final disposal offsite for any hazard determination? | Y___ N___ NA___ |
| §7-304(a) | Did the generator file a notification form? | Y___ N___ NA___ |
| §7-304(b) | Is the RCRIS notification current with regard to waste activity and waste generation? | Y___ N___ NA___ |
| §7-105(a)(2) | Has the generator reported all discharges/releases [in excess of the thresholds listed in §7-105(a)(2)] of a hazardous waste or a hazardous material immediately by phone and written within 10 days? | Y___ N___ NA___ |

Comments: _____

Manifests

- | | | |
|-----------------|--|-----------------|
| §7-702(a)(1) | Did the generator use the appropriate Uniform Hazardous Waste Manifest? | Y___ N___ NA___ |
| §7-702(b)(2) | Is the receiving facility designated on each manifest? | Y___ N___ NA___ |
| §7-702(b)(3) | Is the transporter's name, signature and date of acceptance on the manifest? | Y___ N___ NA___ |
| §7-309(b)(2) | Is hazardous waste offered for shipment to transporters and TSDFs with EPA ID numbers? | Y___ N___ NA___ |
| §7-309(b)(6) | Did the generator complete the generator's portion of the manifest before offering the waste for shipment? | Y___ N___ NA___ |
| §7-702(b)(4) | Did the generator sign and date the manifest? | Y___ N___ NA___ |
| §7-309(b)(5)(B) | If the waste is not considered hazardous in the disposal state, does the generator have that state's authorization to receive the waste? | Y___ N___ NA___ |
| §7-702(b)(5) | Are all signed copies of the manifests retained for at least 3 years? | Y___ N___ NA___ |
| §7-309(b)(6) | Have completed copies arrived within 35 days from the facility or 60 days from the consignee? If NO, see Exception Reports, page 6. | Y___ N___ NA___ |

Manifests

§7-702(b)(6) Did the generator immediately send a copy to the Secretary? Y___ N___ NA___

Comments: _____

Exports

§7-705(b)(1) Did the generator notify the EPA 60 days before the export of a hazardous waste? Y___ N___ NA___

§7-705(b)(1)(A) Did the notification include the generator's name, mailing address, telephone number and EPA ID number? Y___ N___ NA___

§7-705(b)(1)(B) **Did the notification include, by consignee, for each hazardous waste type:**

(i) A description of the hazardous waste, EPA code, DOT shipping name, hazard class, and DOT Code? Y___ N___ NA___

(ii) The frequency or rate and period of time for waste to be exported? Y___ N___ NA___

(iii) The estimated total quantity of waste? Y___ N___ NA___

(iv) All points of entry and departure the waste will pass? Y___ N___ NA___

(v) A description of the means by which each shipment of waste will be transported(e.g., mode of transportation, type of containers)? Y___ N___ NA___

(vi) A description of the manner in which the hazardous waste will be treated, stored or disposed of in the receiving country? Y___ N___ NA___

(vii) The name and site address of the consignee and any alternate consignee? Y___ N___ NA___

(viii) 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? Y___ N___ NA___

§7-705(b)(2) Was a notification sent to the EPA Office of Enforcement and Compliance Assurance; Office of Compliance, Enforcement Planning, Targetting and Data Division? Y___ N___ NA___

§7-705(a)(2) Has the receiving country consented to accept the waste? Y___ N___ NA___

Exports

- §7-705(a)(3) Did a copy of the EPA Acknowledgment of Consent accompany the shipments? Y__ N__ NA__
- §7-710(d)(1) Are copies of each notification of intent to export kept for 3 years? Y__ N__ NA__
- §7-710(d)(2) Are copies of the EPA Acknowledgment of Consent kept for 3 years? Y__ N__ NA__
- §7-710(d)(3) Are completed manifests from consignee kept for 3 years? Y__ N__ NA__

Comments: _____

Exception Reports

Has an exception report been filed for:

- §7-707(a)(1) No completed copy of the manifest from a TSD within 35 days? Y__ N__ NA__
- §7-707(a)(2) No manifest copy from a foreign consignee within 60 days? Y__ N__ NA__
- §7-707(c)(3) For waste returned to the United States? Y__ N__ NA__
- §7-710(a)(1) Are exception reports kept on file for 3 years? Y__ N__ NA__

Comments: _____

Annual Reports

- §7-708(a) Did the generator (if LQG or TSDF) file the most recent biennial report? Y__ N__ NA__
- §7-710(a)(1) Are annual/biennial reports kept for 3 years? Y__ N__ NA__

Comments: _____

Contingency Planning/Employee Training — Small Quantity Generators

(See page 9 for Large Quantity Generators)

§7-307(c)(9)(A) At all times, is an emergency coordinator either on the premises or on call who can complete the § 7-308(b)(9)(F)(i, iii) incident reporting requirement? Y___ N___ NA___

§7-308(b)(9)(E) **Whenever there is an imminent or actual emergency situation, does the emergency coordinator (or designee) know to do the following immediately:**

(i) Activate internal facility alarms or communication systems? Y___ N___ NA___

(ii) Notify appropriate state or local agencies with designated response roles if their help is needed? Y___ N___ NA___

(iii) If a release has occurred, identify the source, character, amount and extent of any released materials by record review or chemical analysis? Y___ N___ NA___

(iv) Assess hazards to human health and the environment, considering all direct and indirect effects? Y___ N___ NA___

(v) **If the emergency coordinator determines that the facility has had a fire, explosion or release which could threaten human health or the environment outside the facility, does the coordinator know to:**

(aa) Determine if local evacuation may be necessary, and, if so, notify appropriate local authorities and be available to assist local authorities in evacuation measures? Y___ N___ NA___

(bb) Notify the National Response Center (800-424-8802) and indicate his or her name and telephone number; name and address of the facility; time and type of incident; quantity of material(s) involved to the extent known; the extent of any injuries; and the possible hazards to human health or the environment outside the facility? Y___ N___ NA___

(vi) Take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous waste at the facility? These measures must include, where applicable, stopping processes and operations, collecting, and containing released waste, and removing or isolating containers. Y___ N___ NA___

Contingency Planning/Employee Training — Small Quantity Generators

(See page 9 for Large Quantity Generators)

(vii) If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, wherever this is appropriate? Y__ N__ NA__

(viii) Immediately after an emergency, the emergency coordinator must provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire or explosion at the facility? Y__ N__ NA__

(ix) Ensure that in the affected areas of the facility, no waste that may be incompatible with the released material is stored until cleanup procedures are completed and all emergency equipment is cleaned and restored to a useable condition? Y__ N__ NA__

§ 7-307(c)(9)(B) **Is the following information next to each telephone in the vicinity of where hazardous wastes are managed?**

(i) The name and telephone numbers (office and home) of the emergency coordinator(s) Y__ N__ NA__

(ii) Location of fire extinguishers and spill control material, and, if present, fire alarm Y__ N__ NA__

(iii) The telephone number of the fire department (unless the facility has a direct alarm) Y__ N__ NA__

§7-307(c)(9)(C) Has annual training been provided to all employees RE: evacuation signals, routes, proper waste handling, and emergency procedures? Y__ N__ NA__

§7-307(c)(9)(C) Do training records document the date of training for each employee? Y__ N__ NA__

§7-307(c)(9)(C) What is the date of the most recent training? _____

Comments _____

Contingency Planning — Large Quantity Generators

§7-308(b)(9) Does the generator have a written contingency plan for the facility? Y___ N___ NA___

§7-308(b)(9)(A) **Does the Contingency Plan contain:**

(i) A description of the actions facility personnel must take to comply with Sections 7-308(b)(9)(A) and 7-308(b)(9)(E) (emergency procedures) in response to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air,soil, groundwater or surface water at the facility? Y___ N___ NA___

(iii) Arrangements agreed to by local police departments, fire departments, hospitals, contractors and state and local emergency response teams to coordinate emergency services pursuant to 7-309(a)(4)? Y___ N___ NA___

(iv) An up-to-date list of names, addresses and office and home phone numbers of all persons qualified to act as emergency coordinator? Y___ N___ NA___

(v) An up-to-date list of all emergency equipment at the facility, including location, physical description of each item listed and a brief outline of its capabilities? Y___ N___ NA___

(vi) An evacuation plan including signals to be used to begin evacuation, evacuation routes and alternate evacuation routes? Y___ N___ NA___

§7-308(b)(9)(B) Are copies of the contingency plan and all revisions maintained at the facility and submitted to all local police and fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services? Y___ N___ NA___

§7-308(b)(9)(C) **Has the contingency plan been reviewed and revised whenever:**

(i) Applicable regulations are revised? Y___ N___ NA___

(ii) The plan fails in an emergency? Y___ N___ NA___

(iii) The facility changes in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency. Y___ N___ NA___

(iv) The list of emergency coordinators changes? Y___ N___ NA___

(v) The list of emergency equipment changes? Y___ N___ NA___

§7-308(b)(9)(D) At all times is there at least one emergency coordinator either at the facility or on call. Y___ N___ NA___

Contingency Planning — Large Quantity Generators

§7-308(b)(9)(E)

Whenever there is an imminent or actual emergency situation, does the emergency coordinator (or his/her designee when the emergency coordinator is on call) know to do the following:

- (i) Activate internal facility alarms or communication systems? Y__ N__ NA__
- (ii) Notify appropriate state or local agencies with designated response roles if their help is needed? Y__ N__ NA__
- (iii) If a release has occurred, identify the source, character, amount and extent of any released materials by record review or chemical analysis? Y__ N__ NA__
- (iv) Assess hazards to human health and the environment, considering all direct and indirect effects? Y__ N__ NA__
- (v) **If the emergency coordinator determines that the facility has had a fire, explosion or release which could threaten human health or the environment outside the facility, Does the coordinator know to:**
 - (aa) Determine if local evacuation may be necessary, and, if so, notify appropriate local authorities and be available to assist local authorities in evacuation measures? Y__ N__ NA__
 - (bb) Notify the National Response Center (800-424-8802) and indicate his or her name and telephone number; name and address of the facility; time and type of incident; quantity of material(s) involved to the extent known; the extent of any injuries; and the possible hazards to human health or the environment outside the facility? Y__ N__ NA__
- (vi) Take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous waste at the facility? These measures must include, where applicable, stopping processes and operations, collecting, and containing released waste, and removing or isolating containers Y__ N__ NA__
- (vii) If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, wherever this is appropriate? Y__ N__ NA__
- (viii) Immediately after an emergency, the emergency coordinator must provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire or explosion at the facility? Y__ N__ NA__
- (ix) Ensure that in the affected areas of the facility, no waste that may be incompatible with the released material is stored until cleanup procedures are completed and all emergency equipment is cleaned and restored to a useable condition? Y__ N__ NA__

Contingency Planning — Large Quantity Generators

§7-308(b)(9)(F) **Whenever there is an imminent or actual emergency situation, Does the owner or operator know to do the following:**

- (i) Notify the Secretary that the facility is in compliance with 7-308(b)(9)(E)(ix) before operations are resumed in the affected areas of the facility? Y__ N__ NA__
- (ii) Maintain on file with the contingency plan a record of the time, date and details of any incident that requires implementing the contingency plan? Y__ N__ NA__
- (iii) Submit a written report on the incident to the Secretary within 15 days after the incident? **Does the report (if applicable) include the following:** Y__ N__ NA__
 - (aa) Name, address and telephone number of the owner or operator? Y__ N__ NA__
 - (bb) Name, address and telephone number of the facility? Y__ N__ NA__
 - (cc) Date, time and type of incident (e.g., fire, explosion)? Y__ N__ NA__
 - (dd) Name and quantity of material(s) involved? Y__ N__ NA__
 - (ee) The extent of injuries, if any? Y__ N__ NA__
 - (ff) An assessment of actual or potential hazards to human health or the environment, where this is applicable? Y__ N__ NA__
 - (gg) Estimated quantity and disposition of recovered material that resulted from the incident? Y__ N__ NA__

Comments: _____

Personnel Training - Large Quantity Generators

- §7-308(b)(10)(A) Have facility personnel successfully completed a program of classroom or on the job instruction that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of the regulations? Y___ N___ NA___
- §7-308(b)(10)(B) Is the personnel training program directed by a person trained in hazardous waste management procedures? Y___ N___ NA___
- §7-308(b)(10)(B) Does the personnel training program teach facility personnel hazardous waste management procedures relevant to the positions in which they are employed? Y___ N___ NA___
- §7-308(b)(10)(C) Does the training program ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems? Y___ N___ NA___
- §7-308(b)(10)(C) **Does the training include (where applicable) the following:**
- (i) Waste handling procedures? Y___ N___ NA___
 - (ii) Procedure for using inspecting, repairing and replacing facility emergency and monitoring equipment? Y___ N___ NA___
 - (iii) Key parameters for automatic waste feed cutoff systems? Y___ N___ NA___
 - (iv) Communications or alarm systems? Y___ N___ NA___
 - (v) Response to fires or explosions? Y___ N___ NA___
 - (vi) Response to groundwater contamination incidents? Y___ N___ NA___
 - (vii) Shutdown of operations? Y___ N___ NA___
- §7-308(b)(10)D Have facility personnel successfully completed the program within 6 months after their date of employment or assignment to a facility or to a new position at a facility? Y___ N___ NA___
- §7-308(b)(10)E Have facility personnel taken part in a review of initial training at least once per calendar year? Y___ N___ NA___
- §7-308(b)(10)(F) **Does the owner or operator maintain the following documents and records at the facility?**
- (i) The job title for each position at the facility related to hazardous waste management and the name of each employee filling each job? Y___ N___ NA___
 - (ii) A written job description for each position under §7-308(b)(10)(F) above which includes the requisite skill, education or other qualifications and duties of personnel assigned to each position? Y___ N___ NA___

Personnel Training - Large Quantity Generators

- (iii) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under §7-308(b)(10)(F)? Y___ N___ NA___

- (iv) Training records that document that the training or job experience required has been given to and completed by facility personnel in accordance with sections A through F above? Y___ N___ NA___

- (v) Are training records kept on current personnel until closure of the facility and on former employees for 3 years from the date the employee last worked at the facility? Y___ N___ NA___

Comments: _____

WASTE ACCUMULATION AND STORAGE - General

- §7-302(a) Has the generator avoided disposing of hazardous waste by evaporation? Y___ N___ NA___

- §7-302(b) Has the generator not diluted hazardous waste? Y___ N___ NA___

- §7-302(c) Has the generator avoided an unpermitted release of a hazardous material to the waters or land? Y___ N___ NA___

- §7-311(g)(1) Are tanks used to store hazardous waste? If Yes Y___ N___ NA___

 If LQG, fill out Tank Checklist (the long one) and AA, BB, CC checklists, as applicable.

 If SQG, fill out SQG Tank Checklist

- §7-311(h) (If LQG) 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. Y___ N___ NA___

Comments: _____

Satellite Accumulation (for SQGs and LQGs)

(See table on page 15 to list satellite accumulation containers)

§7-310(a) 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 (waste **not** defined as hazardous in 40 CFR Part 261), or one quart of acutely hazardous waste, or 55 gallons of any other hazardous waste? Y__ N__ NA__

In containers at or near any point of generation? Y__ N__ NA__

Which is under the control of the operator of the process generating the waste? Y__ N__ NA__

§7-310(a)(1) Are the waste and the container chemically compatible such that no leakage occurs? Y__ N__ NA__

§7-310(a)(2) Is the container in good condition? Y__ N__ NA__

§7-310(a)(3) Is the container located within a structure that sheds rain and snow and on an impervious surface? Y__ N__ NA__

§7-310(a)(4) Is the container holding the waste closed except to add or remove waste? Y__ N__ NA__

§7-310(a)(5) Is the container marked with the words "Hazardous Waste" and other words that identify the contents? Y__ N__ NA__

§7-310(a)(8) Are full containers dated and moved to a short-term storage area within three days of becoming full? Y__ N__ NA__

§7-310(b) **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? If yes:** Y__ N__ NA__

§7-310(b)(1) Is the waste brought directly from the point of generation to the storage area by a trained employee, in a shift accumulation container marked with the words "hazardous waste" and the contents of the container, by the end of each work shift(≤12 hours)? Y__ N__ NA__

§7-310(b)(2) Is the container managed in accordance with the short-term storage area requirements of **Section 7-311** (see pages 16 and 17)? Y__ N__ NA__

§7-310(b)(3) Is each accumulation container in the short-term storage area marked to indicate that it is an accumulation container and as to its point of generation? Y__ N__ NA__

Short-Term Storage Area

(See table on page 18 to list containers in short-term storage)

Location of HW Storage Area(s): _____ Indoors ___ Outdoors ___

§7-307(a)(1) For Small Quantity Generators - Storage less than 180 days? Y___ N___ NA___

§7-307(c)(2) For Small Quantity Generators - Total accumulation on site less than 13,200 pounds (6000 Kg)? Y___ N___ NA___

§7-308(b)(2) For Large Quantity Generators - Storage less than 90 days? Y___ N___ NA___

Short-Term Storage Area — Design and Operating Standards

§7-311(a)(1) Impervious storage surface? Y___ N___ NA___

§7-311(a)(2) Structure to shed snow and ice? Y___ N___ NA___

§7-311(a)(4) Preventive measures for storage of freezable hazardous waste? Y___ N___ NA___

§7-311(a)(5) Is spill or fire control equipment required under **§7-309(a)(1)(A)** available in the vicinity of each short-term storage area? Y___ N___ NA___

§7-311(b)(1) & §7-311(f)(4)(D) iii Are containers or tanks holding incompatible hazardous wastes stored in the same enclosure, building or structure without being segregated in a manner that prevents the wastes from coming into contact with one another? Y___ N___ NA___

§7-311(b)(2) Is hazardous waste labeling visible on all containers? Y___ N___ NA___

§7-311(b)(3) Is aisle space at least 24 inches? Y___ N___ NA___

Short-Term Storage Area - Security

§7-311(e)(1) Is there a warning sign located at each storage area? Y___ N___ NA___

§7-311(e)(2) Is a "No Smoking" sign posted for ignitable wastes in storage? Y___ N___ NA___

§7-311(e)(1&2) Are the signs visible from 25 feet? Y___ N___ NA___

§7-311(e)(1&2) For facilities bordering the province of Quebec, is the legend on the signs written in both English and French? Y___ N___ NA___

Short-Term Storage Area - Containers

§7-311(f)(1) Are containers used for short-term storage cleared labeled with the following:

Generator's name, address and EPA ID number? Y___ N___ NA___

Name and hazardous waste ID number of the waste in the container? Y___ N___ NA___

Short-Term Storage Area

- | | | |
|-----------------------|--|-----------------|
| | Date when the container was first used to accumulate or store hazardous waste? | Y___ N___ NA___ |
| | “Hazardous Waste - Federal Law Prohibits...” language? | Y___ N___ NA___ |
| §7-311(f)(4)(A) | Is the container holding the waste closed except to add or remove waste? | Y___ N___ NA___ |
| §7-311(f)(4)(B) | Are any containers holding hazardous waste not opened, handled or stored in a manner which may rupture the container or cause it to leak? | Y___ N___ NA___ |
| §7-311(f)(4)(C) | Are any containers holding ignitable or reactive waste located greater than 50 feet from the property line? | Y___ N___ NA___ |
| §7-311(f)(4)(D)i | Has the generator avoided placing incompatible wastes/materials into the same container? | Y___ N___ NA___ |
| §7-311(f)(4)(D)
ii | Has the generator avoided placing waste into an unwashed container that previously held an incompatible waste or material? | Y___ N___ NA___ |

Short-Term Storage Area - Inventory & Inspection

- | | | |
|---------------------|---|-----------------|
| §7-311(d)(1) | Is a current hazardous waste inventory maintained at a location apart from the short term storage area? | Y___ N___ NA___ |
| §7-311(d)(2) | Are daily inspections conducted at each short-term storage area? | Y___ N___ NA___ |
| §7-311(d)(2) | Are daily inspection records kept for at least 3 years? | Y___ N___ NA___ |
| §7-311(d)(2) | Is a current inspection checklist maintained for each storage area? | Y___ N___ NA___ |
| §7-311(d)(2) | Does the daily inspection checklist contain the following items: | |
| (A) | Condition of Drums? | Y___ N___ NA___ |
| (B) | Safety and Emergency Equipment? | Y___ N___ NA___ |
| (C) | Aisle Space? | Y___ N___ NA___ |
| (D) | Problems Encountered/Corrective Actions? | Y___ N___ NA___ |
| (E) | Date of Inspection/Inspector's Signature? | Y___ N___ NA___ |

Preparedness & Prevention

§7-309(a) 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? Y___ N___ NA___

§7-309(a)(1) 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:

(A) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel? Y___ N___ NA___

(B) 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? Y___ N___ NA___

(C) 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? Y___ N___ NA___

(D) Water at adequate volume and pressure to supply water hose streams or foam producing equipment, or automatic sprinklers or water spray systems? Y___ N___ NA___

§7-309(a)(2) Are all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency? Y___ N___ NA___

§7-309(a)(3)(A) Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, do all personnel involved in the operation have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee (unless such a device is not required)? Y___ N___ NA___

Preparedness & Prevention

§7-309(a)(3)(B) 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 (unless such a device is not required)? Y___ N___ NA___

§7-309(a)(4) Did the generator make the following arrangements as appropriate for the type of waste handled and the potential need for the services of these organizations, or document refusal of any authorities to enter into such arrangements:

(A) Arrangements to familiarize police departments, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where the facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes? Y___ N___ NA___

(B) Agreements designating primary emergency authority to a specific police department and a specific fire department and agreements with any others to provide support to the primary emergency authority? Y___ N___ NA___

(C) Agreements with emergency response teams, emergency response contractors and equipment suppliers? Y___ N___ NA___

(D) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility? Y___ N___ NA___

Comments: _____

■ **SUMMARY**

Comments or concerns (see also Closing Conference Log): _____

Photos taken, including time, location, and subject: _____

Material provided during the visit:

- ___ Notification of Regulated Waste Activity package (needs to notify if no EPA ID # or if info. has changed)
- ___ Vermont Hazardous Waste Management Regulations (VHWMR)-9/30/98 version (yellow cover)
- ___ Generator Handbook
- ___ DEC Office of Environmental Assistance brochures (pollution prevention compliance assistance)
- ___ Generator Status Comparison Table

Fact Sheet(s):

- | | |
|--|--|
| ___ Antifreeze | ___ Plating P ² Options Checklist |
| ___ Autobody shop fact sheet (from WA state) | ___ Printing P ² Options Checklist |
| ___ Coolant & Cutting Oil P ² Options Checklist | ___ Vehicle Service Waste handbook |
| ___ Determining Regulatory Status | ___ VT Business Materials Exchange info |
| ___ Dry Cleaning-Hazardous waste generation | ___ Waste Mercury-Containing Lamps |
| ___ Laundering Haz. Waste-Contaminated Rags | ___ Waste Oil Burning fact sheet |
| ___ Metal Coating P ² Options Checklist | ___ Waste Oil P ² Options Checklist |
| ___ Oil Filters | ___ Wood Finishing P ² Options Checklist |
| ___ Oily Wastes | ___ Universal Wastes (<input type="checkbox"/> VT <input type="checkbox"/> EPA) |
| ___ Parts Cleaning P ² Options Checklist | ___ Other _____ |
| ___ PCB Contaminated Lighting Ballasts | |