

LARGE QUANTITY HAZARDOUS WASTE GENERATOR CHECKLIST

Purpose and Explanation:

Hazardous waste generators are facilities that store or treat hazardous waste in tanks, containers, containment buildings, or drip pads and accumulate wastes for less than 90 days. Treatment in units other than tanks, containers, or containment buildings would require a hazardous waste treatment or disposal permit; storage for over 90 days would require a hazardous waste storage permit. The following is a general summary of requirements that could apply to a Large Quantity Hazardous Waste Generator (generate > 2,200 lb/mo hazardous waste).

Oregon has adopted all federal hazardous waste regulations pursuant to OAR 340-100-002. In addition to the federal hazardous waste regulations (40 CFR §§ 260 - 270), Oregon has state-only hazardous waste regulations (OAR Chapter 340, Divisions 100-120). The regulatory citations should be consulted for more specific information on individual requirements, as this summary is very generalized and not intended to encompass all aspects of the hazardous waste regulations.

In addition to hazardous waste regulations, this checklist also contains sections for Universal Hazardous Waste (UHW) and Used Oil Management. Although these wastes are not required to be managed as standard hazardous waste, their management is regulated by DEQ's hazardous waste program.

General Information

Site Name _____ ID No. _____

Address _____

Telephone Number _____

Facility Representatives/Titles _____

Inspectors _____

Inspection Date(s) _____

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Northwest Region
2020 SW Fourth, Suite 400
Portland, Oregon 97201
(503) 229-5263*

HAZARDOUS WASTE GENERATOR REQUIREMENT	REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
		YES	NO	N/A	
RECORDKEEPING AND REPORTING REQUIREMENTS					
EPA Identification Number	40 CFR § 262.12(a) OAR 340-102-012				
Retain HW manifests (3 yrs)	40 CFR § 262.40(a)				
Retain LDR notices (3 yrs)	40 CFR § 268.7(a)(8)				
Retain waste determination data (3 yrs)	40 CFR § 262.40(c) OAR 340-102-011(3)				
Annual reporting	OAR 340-102-041				
Retain annual reports (3 years)	OAR 340-102-040(2)				
Hazardous waste generator fees	OAR 340-102-065				
ACCUMULATION TIME LIMITS					
On-site storage for < 90 days	40 CFR § 262.34(a)				
WASTE IDENTIFICATION REQUIREMENTS					
Hazardous waste determination	OAR 340-102-011				
Volatile Organic waste determination (40 CFR 265 Subpart CC)	40 CFR 262.34(a)(1) 40 CFR 265.1084(a)(1)				
Determine all applicable waste code and underlying constituents	40 CFR § 268.9(a)				
LDR waste determination	40 CFR § 268.7(a)				
PERSONNEL TRAINING REQUIREMENTS					
Written Personnel Training Program	40 CFR § 262.34(a)(4) 40 CFR § 265.16(d)(3)				
Written job descriptions	40 CFR § 262.34(a)(4) 40 CFR § 265.16(d)(2)				
Documentation of employee training	40 CFR § 262.34(a)(4) 40 CFR § 265.16(d)(4)				
Annual training updates	40 CFR § 262.34(a)(4) 40 CFR § 265.16(c)				
PREPAREDNESS AND PREVENTION/CONTINGENCY PLAN REQUIREMENTS					
Internal communications/alarms	40 CFR § 262.34(a)(4) 40 CFR § 265.32(a) 40 CFR § 265.34(a)				
External communications	40 CFR § 262.34(a)(4) 40 CFR § 265.32(b)				
Emergency response equipment	40 CFR § 262.34(a)(4) 40 CFR § 265.32(c) & (d)				
Equipment testing	40 CFR § 262.34(a)(4) 40 CFR § 265.33				
Adequate aisle space	40 CFR § 262.34(a)(4) 40 CFR § 265.35				
Arrangements with Local Authorities	40 CFR § 262.34(a)(4) 40 CFR § 265.37				
Written Contingency Plan	40 CFR § 262.34(a)(4) 40 CFR § 265.51(a)				

HAZARDOUS WASTE GENERATOR REQUIREMENT	REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
		YES	NO	N/A	
Description of emergency actions	40 CFR § 262.34(a)(4) 40 CFR § 265.52(a)				
Emergency Coordinator list	40 CFR § 262.34(a)(4) 40 CFR § 265.52(d)				
Emergency Coordinator on-call	40 CFR § 262.34(a)(4) 40 CFR § 265.55				
List and locations of emergency response equipment	40 CFR § 262.34(a)(4) 40 CFR § 265.52(e)				
Evacuation plan	40 CFR § 262.34(a)(4) 40 CFR § 265.52(f)				
Description of arrangements agreed to by Local Authorities	40 CFR § 262.34(a)(4) 40 CFR § 265.52(c)				
Contingency Plan submitted to Local Authorities	40 CFR § 262.34(a)(4) 40 CFR § 265.53(b)				
SHIPPING REQUIREMENTS					
Hazardous Waste Manifest	40 CFR § 262.20				
Land Disposal Restrictions Notification	40 CFR § 268.7				
Out-of-state manifesting requirements	40 CFR § 262.21				
Exception reporting	40 CFR § 262.42(a)(2)				
Export notification 60 days prior to export	40 CFR § 262.53				
ON-SITE TREATMENT REQUIREMENTS					
Treatment only in tanks, containers, containment buildings	ORS 466.095 (1)(c) & 40 CFR § 262.34 (a)				
Written Waste Analysis Plan (if treating to meet LDR standards)	40 CFR § 268.7(a)(5)				
Notification of characteristic HW treatment (updated annually)	40 CFR § 268.9(d)				
Notification of managing waste that is subsequently excluded or exempted	40 CFR 268.7(a)(7)				
CONTAINER STORAGE REQUIREMENTS					
Marked with Accumulation Start Date	40 CFR § 262.34(a)(2)				
Marked with the words "Hazardous Waste"	40 CFR § 262.34(a)(3)				
Containers in good condition	40 CFR § 262.34(a)(1)(i) 40 CFR § 265.171				
Containers closed	40 CFR § 262.34(a)(1)(i) 40 CFR § 265.173				
Weekly inspections	40 CFR § 262.34(a)(1)(i) 40 CFR § 265.174				
Ignitable HW stored < 50 feet from property line	40 CFR § 262.34(a)(1)(i) 40 CFR § 265.176				
Containment structure for storage of >100 containers	OAR 340-102-034(1)				
Satellite Accumulation - < 55 gallons	40 CFR 262.34(c)(1)				

HAZARDOUS WASTE GENERATOR REQUIREMENT	REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
		YES	NO	N/A	
S.A. - Under control of operator	40 CFR § 262.34(c)(1)				
S.A. - Removal of waste exceeding 55 gallons within 3 days	40 CFR § 262.34(c)(2)				
S.A. - Marked with container contents	40 CFR § 262.34(c)(1)(ii)				
S.A. - Containers closed	40 CFR § 262.34(c)(1)(i) 40 CFR § 265.173				
TANK STORAGE REQUIREMENTS					
Marked with the words "Hazardous Waste"	40 CFR § 262.34(a)(3)				
Professional Engineer's assessment of tank system	40 CFR § 262.34(a)(1)(ii) 40 CFR § 265.191(a) 40 CFR § 265.192(a)				
Secondary Containment	40 CFR § 262.34(a)(1)(ii) 40 CFR § 265.193				
S.C. - Specific design standards	40 CFR § 262.34(a)(1)(ii) 40 CFR § 265.193(d), (e)				
S.C. - Leak detection system	40 CFR § 262.34(a)(1)(ii) 40 CFR § 265.193(c)(3)				
S.C. - Removal of liquids from secondary containment system within 24 hours	40 CFR § 262.34(a)(1)(ii) 40 CFR § 265.193(c)(4)				
Ancillary Equipment (either secondary containment or daily inspections)	40 CFR § 262.34(a)(1)(ii) 40 CFR § 265.193(f)				
Variance from secondary containment requirements	40 CFR § 262.34(a)(1)(ii) 40 CFR § 265.193(g)				
Daily inspections	40 CFR § 262.34(a)(1)(ii) 40 CFR § 265.195				
Notification to DEQ of tank system releases	40 CFR § 262.34(a)(1)(ii) 40 CFR § 265.196(d)				
Control of Volatile Organic emissions ¹	40 CFR 262.34(a)(1)(ii) 40 CFR § 265.202 40 CFR § 265.1085				
USED OIL MANAGEMENT REQUIREMENTS					
Used Oil releases cleaned up	ORS 466.645				
Containers/tanks labeled "Used Oil"	40 CFR § 279.22(c)(1)				
Containers/tanks in good condition	40 CFR § 279.22(b)				
Label fill pipes on underground tanks	40 CFR § 279.22(c)(2)				
Containers closed or under cover	OAR 340-111-032(2)				
Used Oil either self-transported or transported by a registered transporter	40 CFR § 279.24				
Control of Volatile Organic emissions ¹	40 CFR § 262.34(a)(1)(i) 40 CFR § 265.178 40 CFR 265.1087				

¹ If tank system is used for storage of volatile organics, evaluate compliance with 40 CFR 265.1085 on a site-specific basis.

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		YES	NO	N/A	
<i>UNIVERSAL HAZARDOUS WASTE REQUIREMENTS</i>					
Containers labeled with contents	40 CFR § 273.14 OAR 340-113-030(6)(a) (Mercury containing lamp)				
Storage time limitations	40 CFR § 273.15(b) 40 CFR § 273.35(b)				
Inventory/dating system to demonstrate compliance with storage time limitations	40 CFR § 273.15(c) 40 CFR § 273.35(c)				
Shipment to UHW handler or TSD	40 CFR § 273.18, 40 CFR § 273.38				
Shipping documentation [Large Quantity Handlers (>5,000 kg) only]	40 CFR § 273.39(b)				
Retain shipping documentation (3 years - Large Quantity Handlers only)	40 CFR § 273.39(c)				

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CONTAINMENT BUILDING STORAGE REQUIREMENTS					
Professional Engineer's assessment	40 CFR § 262.34(a)(1)(iv) 40 CFR § 265.1101(c)(2)				
Written description of procedures to ensure storage < 90 days	40 CFR § 262.34(a)(1)(iv)(A)				
Documentation of waste removal every 90 days	40 CFR § 262.34(a)(1)(iv)(B)				
Secondary containment for liquid storage	40 CFR § 262.34(a)(1)(iv) 40 CFR § 265.1100(c)				
Specific design standards for secondary containment	40 CFR § 262.34(a)(1)(iv) 40 CFR § 265.1101(b)				
Fugitive dust controls	40 CFR § 262.34(a)(1)(iv) 40 CFR § 265.1101(c)(1)				
Weekly inspections	40 CFR § 262.34(a)(1)(iv) 40 CFR § 265.1101(c)(4)				
DRIP PAD REQUIREMENTS					
Description of waste removal procedures (every 90 days)	40 CFR § 262.34(a)(1)(iii)(A)				
Documentation of waste removal	40 CFR § 262.34(a)(1)(iii)(B)				
Storage yard drippage management	40 CFR § 262.34(a)(1)(iii) 40 CFR § 265.440(c)				
Professional Engineer's assessment	40 CFR § 262.34(a)(i)(iii) 40 CFR § 265.441(a) 40 CFR § 265.443(a)(4)(ii) 40 CFR § 265.443(g)				
Construction specifications	40 CFR § 262.34(a)(1)(iii) 40 CFR § 265.443(a)(1)-(3)				
Hydraulic conductivity/sealing	40 CFR § 262.34(a)(1)(iii) 40 CFR § 265.443(a)(4)(i)				
Leakage collection system	40 CFR § 262.34(a)(1)(iii) 40 CFR § 265.443(b)				
Free of cracks and gaps	40 CFR § 262.34(a)(1)(iii) 40 CFR § 265.443(c)				
Runon/runoff/24 hour, 25 year storm management	40 CFR § 262.34(a)(1)(iii) 40 CFR § 265.443(d)-(f)				
Cleaning to permit weekly inspections	40 CFR § 262.34(a)(1)(iii) 40 CFR § 265.443(i)				
Operated to minimize tracking of hazardous constituents	40 CFR § 262.34(a)(1)(iii) 40 CFR § 265.443(j)				
Treated wood held until drippage has ceased	40 CFR § 262.34(a)(1)(iii) 40 CFR § 265.443(k)				
Response to releases	40 CFR § 262.34(a)(1)(iii) 40 CFR § 265.443(m)				
Weekly inspections	40 CFR § 262.34(a)(1)(iii) 40 CFR § 265.444(b)				