

Small Quantity Hazardous Waste Generator Checklist



Purpose and Explanation:

Hazardous waste generators are facilities that store or treat hazardous waste in tanks or containers and accumulate wastes for less than 180 days. Treatment in units other than tanks or containers would require a hazardous waste treatment or disposal permit; storage for over 180 days (except under certain conditions) would require a hazardous waste storage permit. The following is a general summary of requirements that could apply to a Small Quantity Hazardous Waste Generator (generate between 220 and 2,200 lb/mo hazardous waste, and store less than 13,200 lb total).

Oregon has adopted all federal hazardous waste regulations pursuant to OAR 340-100-0002. 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 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. (For drip pads and containment buildings see the LQG checklist.)

General Information

Site Name ID No.

Physical Location

Telephone Number

Facility Representatives/Titles

Inspectors

Inspection Date(s)

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 340-102-0012				
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 340-102-0011(3)				
Annual reporting	OAR 340-102-0041				
Retain annual reports (3 years)	OAR 340-102-0040(2)				
Hazardous waste generator fees	OAR 340-102-0065				
ACCUMULATION LIMITS					

HAZARDOUS WASTE GENERATOR REQUIREMENT	REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
		YES	NO	N/A	
On-site storage for < 180 days	40 CFR § 262.34(f)				
On-site storage < 270 days (if transporting > 200 miles)	40 CFR § 262.34(e)				
Storage of less than 13,200 lbs	40 CFR § 262.34(d)(1)				
WASTE IDENTIFICATION REQUIREMENTS					
Hazardous waste determination	OAR 340-102-0011				
LDR waste determination	40 CFR § 268.7(a)				
Determine all applicable waste code and underlying constituents	40 CFR § 268.9				
PERSONNEL TRAINING REQUIREMENTS					
Ensure employee awareness of waste handling/emergency	40 CFR § 262.34(d)(5)(iii)				
EMERGENCY MANAGEMENT REQUIREMENTS					
Internal communications/alarms	40 CFR § 262.34(d)(4) 40 CFR § 265.32(a)				
External communications	40 CFR § 262.34(d)(4) 40 CFR § 265.32(b)				
Emergency response equipment	40 CFR § 262.34(d)(4) 40 CFR § 265.32(c),(d)				
Equipment testing	40 CFR § 262.34(d)(4) 40 CFR § 265.33				
Adequate aisle space	40 CFR § 262.34(d)(4) 40 CFR § 265.35				
Arrangements with Local Authorities	40 CFR § 262.34(d)(4) 40 CFR § 265.37				
Designated emergency coordinator, on-site or on-call	40 CFR § 262.34(d)(5)(i)				
Information posted next to telephone: A. Name and telephone number of emergency coordinator B. Location of fire extinguishers, spill equipment, alarms. C. Fire department phone number	40 CFR § 262.34(d)(5)(ii)				
SHIPPING REQUIREMENTS					
Hazardous Waste Manifest	40 CFR § 262.20				
Land Disposal Restrictions Notification	40 CFR § 268.7				
Illegal Disposal	ORS 466.100(1)				
Exception reporting	40 CFR § 262.42(a)				
Export notification 60 days prior to export	40 CFR § 262.53				

HAZARDOUS WASTE GENERATOR REQUIREMENT	REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
		YES	NO	N/A	
ON-SITE TREATMENT REQUIREMENTS					
Treatment only in tanks or containers	ORS 466.095 (1)(c) 40 CFR § 262.34(d)				
Written Waste Analysis Plan (if treating to meet LDR standards)	40 CFR § 268.7(a)(5)				
Notification of managing waste that is subsequently excluded or exempted	40 CFR 268.7(a)(7)				
Determine all applicable waste codes and underlying constituents	40 CFR § 268.9(a)				
Notification of characteristic HW treatment maintained in files (updated annually or if process	40 CFR § 268.9(d)				
CONTAINER STORAGE REQUIREMENTS					
Marked with Accumulation Start Date	40 CFR § 262.34(d)(4) 40 CFR § 262.34(a)(2)				
Marked with the words "Hazardous Waste"	40 CFR § 262.34(d)(4) 40 CFR § 262.34(a)(3)				
Containers in good condition	40 CFR § 262.34(d)(2) 40 CFR § 265.171				
Containers closed	40 CFR § 262.34(d)(2) 40 CFR § 265.173				
Weekly inspections	40 CFR § 262.34(d)(2) 40 CFR § 265.174				
Containment structure for storage of > 100 containers	OAR 340-102-0034(1)				
Satellite Accumulation - < 55 gallons	40 CFR § 262.34(c)(1)				
S.A. - At or near Point of Generation	40 CFR § 262.34(c)(1)				
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(d)(4) 40 CFR § 262.34(a)(3)				
2 feet freeboard or containment structure (uncovered tanks)	40 CFR § 262.34(d)(3) 40 CFR § 265.201(b)(3)				
Waste feed cutoff system or bypass	40 CFR § 262.34(d)(3) 40 CFR § 265.201(b)(4)				

HAZARDOUS WASTE GENERATOR REQUIREMENT	REGULATORY CITATION(S)	COMPLIANCE?			COMMENTS
		YES	NO	N/A	
Daily inspections of discharge equipment, monitoring equipment, waste levels	40 CFR § 262.34(d)(3) 40 CFR § 265.201(c)(1)-(3)				
Weekly inspections of tank and containment structures	40 CFR § 262.34(d)(3) 40 CFR § 265.201(c)(4)-(5)				
Ignitable storage (protected from sources of ignition and buffer zone)	40 CFR § 265.34(d)(3) 40 CFR § 265.201(e)(1)-(2)				
UNIVERSAL HAZARDOUS WASTE REQUIREMENTS					
Containers labeled with contents	40 CFR 273.14				
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)				
USED OIL MANAGEMENT REQUIREMENTS					
Containers/tanks in good condition	40 CFR 279.22(b)				
Containers/tanks/fill pipes labeled "Used Oil"	40 CFR 279.22(c)				
Used Oil releases cleaned up	ORS 466.645				
Containers closed or under cover	OAR 340-111-0032(2)				
Used Oil either self-transported or transported by a registered transporter	40 CFR 279.24				