

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 | | | | | |

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|--|---|-------------|----|-----|----------|
| | | 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 | | | | |

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|---|--|-------------|----|-----|----------|
| | | 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) | | | | |

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|---|---|-------------|----|-----|----------|
| | | 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 | | | | |