

**Oregon Department of Environmental Quality**  
**Toxics Use and Hazardous Waste Reduction (TUHWR)**  
 Compliance Checklist



TUHWR Compliance Checklist	Yes	No	NA
<b>Planning</b>			
1. Is the business excluded from complying with the TUHWR requirements?			
2. Does the business have a TUHWR Plan or environmental management system (EMS) that is ISO 14001 or equivalent?			
3. Does the Plan contain the required six elements: <ul style="list-style-type: none"> <li>• A written policy articulating organizational support for the toxics use reduction and hazardous waste reduction plan and a commitment by the organization to implement plan goals?</li> <li>• A description of its scope and objectives, including the evaluation of technologies, procedures and personnel training programs to ensure unnecessary toxic substances are not used and unnecessary waste is not generated?</li> <li>• Internal analysis and periodic assessment of individual processes for toxics use and hazardous waste generation?</li> <li>• Identification of opportunities to reduce or eliminate toxics use and hazardous waste generation?</li> <li>• Employee awareness and training programs that involve employees in toxics use reduction and hazardous waste reduction planning and implementation.</li> <li>• Institutionalization of the plan by incorporating the plan into management practices and procedures?</li> </ul>			
4. Does the EMS contain the required 10 elements?			
5. Does the Plan or EMS include the most recent chemicals reported under the federal toxics release inventory (TRI) program?			
6. Does the Plan or EMS include the most recent hazardous wastes reported to DEQ last year (10% or greater of the total)?			
<b>Reporting</b>			
1. Did the business submit a Notice of Plan Completion (NPC) or Notice of EMS Completion (NEMSC)?			
2. Did the New business submit an NPC or NEMSC within 120 days of the official DEQ notification?			
3. Did the Current business submit its one Implementation Summary electronically?			
4. Did the New business submit its two Implementation Summaries, or is in the process of fulfilling this requirement?			
<b>Plan or EMS Maintenance</b>			
1. Is the Plan or EMS kept on site?			
2. Is the Plan or EMS current to reflect the most current processes, staff, TRI chemicals (if applicable), hazardous waste, and reduction strategies?			