

#	Physical Location(s)	Aspect Reviewed	Regulatory Requirement	Key Questions
1	Facility.	EPA ID number.	Get permanent EPA ID number (unless generation is exempt or episodic). 40 CFR 262.12	EPA ID number assigned and correct? No episodic hazardous waste generation? Any record of large generation thru spill cleanup?
2	Facility.	Generator status.	Specify generator status on ID notification form. 40 CFR 262.5(e) and 262.12.	Is current facility generator status accurate? Facility identified as small quantity generator? Any episodic excursions into generator status? Soil excavations not affect generator status?
3	Container storage area (CSA) for holding hazardous wastes; material storage areas.	Storage accumulation time.	Hold hazardous wastes in storage less than 90 days (LQG) or 180 days (SQG). 40 CFR 262.34(a) and (d)	Any hazardous waste drum >180 days old? Any obsolete material designated for disposal?
4	Container storage area (CSA) for holding hazardous wastes.	Container marking.	Apply hazardous waste labels with proper code and date of entry into CSA. 40 CFR 262.34(a)(2) and (3)	All drums have appropriate hazardous waste label? Date of entry into CSA entered on labels? All appropriate waste ID codes entered on labels?
5	Facility.	Hazardous waste determination.	Conduct a hazardous waste determination on all wastes. 40 CFR 261.4(b) and 262.11	Written basis for waste determinations on file? Each determination reasonably current? Each determination accurate for waste ID codes?
6	Facility operations or maintenance functions.	Satellite accumulation.	Keep less than 1 drum per waste, at/near process, under control of operator, marked appropriately. 40 CFR 262.34(c)	Satellite accumulation drums identified properly? Drums kept closed when not adding waste? Sealed and moved to CSA promptly when full?
7	Facility maintenance functions.	Spill prevention.	Store hazardous wastes on impervious surface with secondary containment. 40 CFR 262.34(a)(1) and (d)(2), 265 Subpart I; RCRA 22a-449(c)-102(a)(2)(B) and 105(b).	Liquid drums stored on secondary containment? Containment surface impervious to waste spills? No seams, cracks or other pathways to outside?
8	Container storage area (CSA) for holding hazardous wastes.	Storage of incompatibles.	Keep chemicals separated if they would react with each other. 40 CFR 262.34(d)(2) and 265.177(c)	No incompatible wastes adjacent to each other? Separate containments for incompatibles?
9	Container storage area (CSA) for holding hazardous wastes.	Access to containers.	Keep aisles clear, container labels visible, in case of emergency. 40 CFR 265.35	Adequate aisle space or access for moving drums? Drums oriented so labels are visible in emergency?

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10	Container storage area (CSA) for holding hazardous wastes.	Identification of area and hazards.	Post CSA with <i>No Smoking</i> sign (if flammables) and <i>Hazardous Waste Storage Area</i> sign. 40 CFR 265.32	<i>No Smoking</i> sign posted inside CSA? <i>Hazardous Waste Storage</i> sign posted in CSA?
11	Container storage area (CSA) for holding hazardous wastes.	Periodic inspections.	Inspect CSAs weekly, using checklist, document results, fix any problems. 40 CFR 265.15; RCSA 22a-449(c)-102(b)(2)	Inspection schedule and log posted in CSA? Log contains all required elements? Weekly inspections complete and up to date? Corrective actions taken/documentated as needed?
12	Container storage area (CSA) for holding hazardous wastes.	Emergency equipment.	Maintain fire suppression, communications and spill equipment accessible near CSA. 40 CFR 265.32	Fire extinguisher accessible/suitable for wastes? Phone in a nearby/accessible location? Overfill drum / sorbents / pads available in CSA?
13	Container storage area (CSA) for holding hazardous wastes.	Emergency equipment operability.	Periodically verify operability of fire suppression, communications and spill equipment. 40 CFR 265.33 and 265.34; 29 CFR 1910.38 and 1910.157	Fire extinguishers visually inspected monthly? Annual maintenance check done on extinguishers? Fire extinguishers on routine inspection schedule? Phone and spill equipment on inspection schedule?
14	Administration.	Contingency plan.	Capability to handle hazardous waste emergencies including a designated emergency coordinator (EC), posted emergency information, personnel training, and proper response actions. 40 CFR 262.34(d)(5), 29 CFR 1910.120(q)(6) and 1910.38.	Is there a written emergency or contingency plan? Does the plan have a list of emergency contacts? Are the contacts and phone numbers current? Is facility evacuation information posted? Are all designated response personnel trained? Are other facility personnel trained to evacuate? Does the plan include appropriate procedures?
15	Administration.	Contingency plan coordination with outside support.	Arrange appropriate support services with fire, police, emergency medical, and hospitals. 40 CFR 265.37	Is there a need to send out emergency plan copies? Has the plan been sent to appropriate agencies? Is acknowledgment of plan receipt on file?
16	Administration.	Training on contingency plan.	Train identified personnel in appropriate actions. 40 CFR 262.34(d)(6); 29 CFR 1910.120(q)(6)	All personnel trained in evacuation signal/routes? Appropriate personnel trained on fire extinguishers? Emergency responders trained on hazards?

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17	Container storage area (CSA) for holding hazardous wastes.	Waste shipment preparation.	Mark containers appropriately, use only licensed transporter and disposal facility. 40 CFR 262.20, 262.30-33.	All relevant waste ID codes entered on labels? Transporter has EPA ID number? Disposal facility has EPA ID number?
18	Administration.	Waste shipment paperwork.	Fill out manifest properly, keep manifest file, track return manifests not received, keep waste analysis information related to land disposal restriction notice. 40 CFR 262.20 - 262.23, 262.40, 262.42, and 268.7(a).	Manifest prepared by disposal contractor verified? Manifest file contains copy 3, copy 8 and LDR form? No copies 6 or 7 in file; all sent to state agencies? Information in file on land disposal determination? Procedure set up for preparing correct manifests? Procedure set up for no manifest return in 45 days?
19	Administration.	Waste minimization program.	Prepare and implement written plan to minimize hazardous waste generation (LQG), or develop procedures to minimize generation (SQG). 40 CFR 262.41(a)(6); RCSA 22a-449(c)-102(a)(2)(I)	Is there on file a written waste minimization plan? Is the plan consistent with manifest certification? Is there documentation of procedures to minimize?
20	Administration.	Reporting hazardous waste generation.	Prepare a biennial report on EPA forms in even-numbered years. 40 CFR 262.41(a); RCSA 22a-449(c)-102(a)(2)(I)	Reports on file for each odd-numbered year? Reports filed by 3/1 of even-numbered years? Reports accurate and complete?
21	Utility rooms, maintenance functions.	Non-process, non-routine maintenance or cleaning wastes.	Make hazardous waste determination on non-routine wastes (e.g., boiler firebox cleanout, other maintenance wastes). 40 CFR 262.11	Any oil traps or separators on water discharges? Any equipment oil/heat transfer fluid changeouts? Any chiller system overhaul wastes? If any of above, are waste determinations made?
22	Administration.	Regulated waste determination.	If not a hazardous waste, determine if a solid waste is a CT-regulated waste. CGS 22a-454; 40 CFR 279.10(a).	Waste oil a spec or off-spec waste oil, not HW fuel? Waste oil been adequately tested by disposer? Waste metal scrap confirmed to be recycled? No liquid or solid non-hazardous waste chemicals?
23	Processes, building cooling loops.	Waste oils.	Determine waste oil is not a hazardous waste, handle appropriately. 40 CFR 279.10(b) and 279.22, CGS 22a-454.	No oil drained from cooling system compressors? No oil drained from hydraulic systems? Waste oil from equipment verified non-hazardous? Periodic characterizations by disposer all okay? Facility only a used oil generator, not a marketer?

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24	Facility.	Universal wastes.	Treat waste batteries, thermostats and pesticides appropriately. 40 CFR 266.80, 273.2, 273.3, 273.4.	<p>No storage/accumulation of used batteries?</p> <p>No storage/accumulation of waste thermostats?</p> <p>No storage/accumulation of waste pesticides?</p>
25	Hazardous waste container storage area (CSA).	Closure and corrective actions.	Close former CSAs under a formal testing program, take corrective actions to clean up where appropriate. RCSA 22a-449(c)-102(a)(1) and -102(c)(2)	<p>Was there an interim status Part A filing?</p> <p>Has a closure plan been developed for the CSA?</p> <p>Was the CSA closed according to the plan?</p> <p>Is there a closure certification on file?</p> <p>Does the closure (if historical) meet DEP guidance?</p>
26	Losses, leaks, spills or releases of hazardous waste anywhere on facility.	Spill reporting and corrective actions.	Report spill to DEP, other agencies. CGS 22a-450. Take corrective actions to clean up where appropriate. RCSA 22a-449(c)-102(a)(1) and -102(c)(2); 22a-133k.	<p>Any record of spill or release:</p> <p>Spill or release reported to DEP?</p> <p>Documentation available on extent of release?</p> <p>Required cleanup actions taken?</p> <p>Cleanup to remediation standards regulation?</p>