

SMALL QUANTITY GENERATOR REQUIREMENTS

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- ◇ Facilitate P2 discussions;
- ◇ Identify barriers to P2;
- ◇ Define the P2 universe;
- ◇ Identify the need for future P2 initiatives;
- ◇ Identify partnership opportunities; and
- ◇ Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?
2. What is the largest waste stream that you generate?
3. How important would it be to you to eliminate that waste stream?
4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?
5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of waste generated? Yes ___ No ___ N/A ___ RMK#
 - a. If so, what has the company done to minimize waste generation?
 - A change in the process resulting in less waste.
 - A change in the product resulting in less waste.
 - Use of fewer and less toxic hazardous raw materials.
 - Better operations/improved housekeeping.
 - On-site recycling/reuse of hazardous materials.
 - Sending waste off-site for recycling/reuse.
 - Other activities (specify):

b. **If so**, what wastes have been addressed?

- | | |
|---|---|
| <input type="checkbox"/> Solvents | <input type="checkbox"/> Waste water |
| <input type="checkbox"/> Paint related wastes | <input type="checkbox"/> Solid waste (paper, plastic, metal, wood, blasting material) |
| <input type="checkbox"/> Industrial process wastes (sludges, slags, contaminated wastes waters, etc.) | <input type="checkbox"/> Air emissions |
| <input type="checkbox"/> Contaminated oils/hydraulic fluids | <input type="checkbox"/> Energy use |
| <input type="checkbox"/> Off-spec chemicals | <input type="checkbox"/> Fluorescent light bulbs |
| <input type="checkbox"/> Shop rags | <input type="checkbox"/> Used batteries |
| <input type="checkbox"/> Other (specify): | |

c. If they haven't minimized waste are there barriers that are preventing them from doing it?

- Lack of information about practical alternatives.
- Lack of capital to make process changes.
- Lack of internal management support.
- The company does not generate enough waste to consider P2.
- Other reason given (specify):

2. Does the company plan to do P2 activities in the future? Yes ___ No ___ N/A ___ RMK#

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes ___ No ___ N/A ___ RMK#

4. Did you give the company information about P2 during the inspection? Yes ___ No ___ N/A ___ RMK#

5. Would the company like a P2 assessment? Yes ___ No ___ N/A ___ RMK#

A. If yes, provide information that makes the company a good candidate for an assessment (i.e., known specific P2 opportunities exist, the company is willing to cooperate and commit resources to the assessment, the company fully understands DHWM's P2 assessment process, etc.)

B. If no, list the reasons the facility representative gave for not wanting an assessment.

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention for Hazardous Waste Generators document and discuss it with them.

REMARKS

SMALL QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION

1. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes ___ No N/A ___ RMK# ___

IDENTIFICATION NUMBER

2. Has the generator obtained a US EPA ID number? [3745-52-12] Yes ___ No N/A ___ RMK# ___

ACCUMULATION OF HAZARDOUS WASTES

3. Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734.02(E)(F)] Yes No ___ N/A ___ RMK# ___

NOTE: ***SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days.*** [3745-52-34(E)]

4. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)(F)] Yes No ___ N/A ___ RMK# ___

NOTE: ***6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.***

MANIFEST REQUIREMENTS

5. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)] Yes ___ No N/A ___ RMK# ___

6. Are wastes reclaimed under a contractual agreement? If so: Yes ___ No ___ N/A ___ RMK# ___

- a. Does the contractual agreement specify the type of waste and frequency of shipment? [3745-52-20(E)(1)(a)] Yes ___ No N/A ___ RMK# ___

- b. Is the transport vehicle owned and operated by the reclaimer? [3745-52-20(E)(1)(b)] Yes ___ No N/A ___ RMK# ___

- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? [3745-52-20(E)(2)] Yes ___ No N/A ___ RMK# ___

Note: ***Even if the waste is being reclaimed under contractual agreement, LDRs still apply. Complete LDR checklist.***

7. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes ___ No ___ N/A ___ RMK# ___
- a. Have items 1 through 20 of each manifest been completed? [3745-52-20(A)] Yes ___ No N/A ___ RMK# ___
- b. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] Yes ___ No N/A ___ RMK# ___

NOTE: *U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be completed. [3745-52-20(A)]*

NOTE: *The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].*

8. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes ___ No N/A ___ RMK# ___
9. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) and (2)] Yes ___ No N/A ___ RMK# ___
10. Has the generator received a returned copy of each completed manifest within 60 days of being accepted by the transporter? If not: Yes ___ No ___ N/A ___ RMK# ___
- a. Did the generator submit, to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)] Yes ___ No N/A ___ RMK# ___
11. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes ___ No N/A ___ RMK# ___

NOTE: *Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.*

REMARKS

PREPAREDNESS AND PREVENTION

- 1. Is an emergency coordinator available at all times? [3745-52-34(D)(5)(a)] Yes ___ No N/A ___ RMK# ___

- 2. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]
 - a. Name and telephone number of emergency coordinator? Yes ___ No N/A ___ RMK# ___
 - b. Location of fire and spill control equipment, and, if present, fire alarm(s)? Yes ___ No N/A ___ RMK# ___
 - c. Telephone number of local fire department? Yes ___ No N/A ___ RMK# ___

- 3. Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)] Yes ___ No N/A ___ RMK# ___

- 4. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes ___ No N/A ___ RMK# ___

- 5. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31] Yes ___ No N/A ___ RMK# ___

- 6. Does the generator have the following equipment at the facility if it is required due to the actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]
 - a. Internal alarm system? Yes ___ No N/A ___ RMK# ___
 - b. Emergency communication device? Yes ___ No N/A ___ RMK# ___
 - c. Portable fire control, spill control and decon equipment? Yes ___ No N/A ___ RMK# ___
 - d. Water of adequate volume/pressure? Yes ___ No N/A ___ RMK# ___

- 7. Is emergency equipment tested (inspected) to assure its proper operation in time of emergency and maintained as necessary? [3745-65-33] Yes ___ No N/A ___ RMK# ___
 - a. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes ___ No N/A ___ RMK# ___

8. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under OAC 3745-65-32*)? [3745-65-34] Yes ___ No N/A ___ RMK# ___
9. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ___ No N/A ___ RMK# ___
10. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes ___ No N/A ___ RMK# ___
- a. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes ___ No N/A ___ RMK# ___

REMARKS

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

- 1. Does the generator ensure that satellite accumulation area(s):
 - a. Are at or near a point of generation? Yes ___ No N/A ___ RMK# ___
 - b. Are under the control of the operator of the process generating the waste? Yes ___ No N/A ___ RMK# ___
 - c. Do not exceed a total of 55 gallons of hazardous waste? Yes ___ No ___ N/A ___ RMK# ___
 - d. Do not exceed one quart of acutely hazardous waste at any one time? Yes ___ No ___ N/A ___ RMK# ___
 - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes ___ No N/A ___ RMK# ___

NOTE: *The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation. The inspector should refer to Guidance Document #DHWM-008, Satellite Accumulation Under Ohio Hazardous Waste Rules.*

- 2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1(c) or 1(d)? If so: Yes ___ No ___ N/A ___ RMK# ___
 - a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes ___ No N/A ___ RMK# ___
 - b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes ___ No N/A ___ RMK# ___

USE AND MANAGEMENT OF CONTAINERS

- 3. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes ___ No N/A ___ RMK# ___
- 4. Is the accumulation date on each container? [3745-52-34(D)(4)] Yes ___ No N/A ___ RMK# ___
- 5. Are hazardous wastes stored in containers which are: [3745-52-34(D)(4)]
 - a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ___ No N/A ___ RMK# ___
 - b. In good condition? [3745-66-71] Yes ___ No N/A ___ RMK# ___
 - c. Compatible with wastes stored in them? [3745-66-72] Yes ___ No N/A ___ RMK# ___

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ___ No N/A ___ RMK# ___

6. Is the container accumulation area inspected at least weekly? [3745-66-74] Yes ___ No N/A ___ RMK# ___

a. Are inspections recorded in a log or summary? [3745-66-74] Yes ___ No N/A ___ RMK# ___

7. Are containers of ignitable and/or reactive hazardous waste(s) stored away from materials that they may react with in a hazardous manner? [3745-66-77(C)] Yes ___ No N/A ___ RMK# ___

PRE-TRANSPORT REQUIREMENTS

8. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes ___ No N/A ___ RMK# ___

9. Does each container ≤110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ___ No N/A ___ RMK# ___

10. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ___ No N/A ___ RMK# ___

REMARKS

TANK SYSTEM REQUIREMENTS

1. Is each tank marked with the words "Hazardous Waste"? [3745-52-34(A)(3)] Yes ___ No N/A ___ RMK# ___

TANK SYSTEM OPERATING REQUIREMENTS (OAC 3745-66-101)

2. Is the SQG complying with the following operating requirements of OAC 3745-66-101(B):
- a. Is the storage and/or treatment of ignitable, reactive or incompatible waste done in accordance with precautionary measures of 3745-65-17(B)? Yes ___ No N/A ___ RMK# ___
 - b. Does the SQG ensure that wastes are not placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode or fail? Yes ___ No N/A ___ RMK# ___
 - c. Are uncovered tanks operated with 2 feet of freeboard? Yes ___ No ___ N/A ___ RMK# ___
 - i. **If not**, is the tank equipped with a containment structure, drainage control system, or diversion structure with a capacity that equals or exceeds the volume of the top 2 feet of the tank? Yes ___ No N/A ___ RMK# ___
 - ii. **If waste is continuously added to the tank:** Is the tank equipped with a waste feed cut-off or bypass system? Yes ___ No N/A ___ RMK# ___

TANK SYSTEM INSPECTION (OAC 3745-66-101(C))

3. Does the generator inspect the following: [3745-66-101(C):
- a. Discharge control equipment (daily)? Yes ___ No N/A ___ RMK# ___
 - b. Data from monitoring equipment (daily)? Yes ___ No N/A ___ RMK# ___
 - c. The level of the waste in the tank (daily)? Yes ___ No N/A ___ RMK# ___
 - d. The tanks construction material (weekly)? Yes ___ No N/A ___ RMK# ___
 - e. The area surrounding the tank (weekly)? Yes ___ No N/A ___ RMK# ___

TANK SYSTEM CLOSURE REQUIREMENTS (OAC 3745-66-101(D))

4. Upon closure of the tank did the SQG remove all hazardous waste from the tank system in compliance with OAC 3745-66-992(D)? Yes ___ No N/A ___ RMK# ___

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES (OAC 3745-66-101(E) & (F))

5. For tanks used to store ignitable or reactive wastes, has the owner/operator complied with **one of the following**: [3745-66-101(E)]
- a. Is the waste stored or treated to protect it from any materials or conditions that may cause the waste to ignite or react? [3745-66-101(E)(1)(b)] Yes ___ No ___ N/A ___ RMK# ___
 - b. Is the tank used solely for emergencies? [3745-66-101(E)(1)(c)] Yes ___ No ___ N/A ___ RMK# ___
6. If ignitable or reactive waste is stored in covered tanks, are protective distances maintained between the tanks and any public streets, alleys, or adjoining property lines as required by the NFPA Flammable and Combustible Liquid Code (1977 or 1981)? [3745-66-101(E)(2)] Yes ___ No N/A ___ RMK# ___
7. Have incompatible wastes, or incompatible wastes and materials been placed into the same tank? [3745-66-101(F)] Yes ___ No ___ N/A ___ RMK# ___
- If so*, have the requirements of 3745-65-17(B) been met? Yes ___ No N/A ___ RMK# ___
8. Have hazardous wastes been placed in an unwashed tank which previously held an incompatible waste or material? [3745-66-101(F)(2)] Yes ___ No ___ N/A ___ RMK# ___
- If so*, have the requirements of 3745-65-17(B) been met? Yes ___ No N/A ___ RMK# ___

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REMARKS