

Compliance Monitoring Inspection Checklist  
For  
Small Quantity Generators

South Carolina Department of  
Health and Environmental Control

Bureau of Land and Waste Management  
Division of Compliance and Enforcement

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TABLE OF CONTENTS

<u>ITEM</u>	<u>PAGES</u>
Name and EPA ID Number.....	1 _____
Subpart B Manifest.....	1 _____
Subpart C Pre-transport Requirements.....	3 _____
Subpart D Record Keeping and Reporting.....	5 _____
Subpart E Special Conditions.....	6 _____
Subpart H Discharge Reporting.....	8 _____
Personnel Training/Preparedness and Prevention.....	9 _____
Subpart I Use and Management of Containers.....	10 _____
Subpart J Tanks.....	11 _____
Section 268 Land Disposal Restrictions.....	12 _____

SOUTH CAROLINA HAZARDOUS WASTE COMPLIANCE  
INSPECTION CHECKLIST  
FOR  
SMALL QUANTITY GENERATORS

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The purpose of this inspection is to determine compliance with the South Carolina Hazardous Waste Management Regulations promulgated pursuant to Section 44-56-10 et seq. of the 1976 South Carolina Code of Laws, as amended.

Facility: \_\_\_\_\_ Date: \_\_\_\_\_

EPA ID Number: \_\_\_\_\_ Inspector: \_\_\_\_\_

(GGR)

- 262.12(a) Does generator have an EPA ID #? \_\_\_\_\_  
If no, generator should complete notification form (2701) and submit to DHEC.
- 262.34 (D) Does industry generate greater than 100 kg but less than 1000 kg per month? \_\_\_\_\_

Subpart B - Manifest (GMR)

- 262.20(a) Does generator manifest waste shipped off-site using uniform hazardous waste manifest? \_\_\_\_\_
- 262.20(e) Does the generator have a permit to transport hazardous waste off site pursuant to R.61-79.263 of these regulations? \_\_\_\_\_  
If yes, complete transporter checklist.
- 262.20(e) If no, does the generator utilize a transporter who is permitted pursuant to R.61-79.263 of these regulations? \_\_\_\_\_  
Note: If the following occurs, the generator is not required to comply with Subpart B of 262 which pertains to manifesting requirements.
- 262.21(e) (1) Does the generator have any contracts in place for reclaiming hazardous waste? \_\_\_\_\_
- 262.20(e) (1) (i) Is the type of waste and frequency of shipments specified in the agreement? \_\_\_\_\_
- 262.20(e) (1) (ii) Is the vehicle used to transport the waste to the recycling facility and deliver regenerated material back to the generator owned and operated by the recycler of the waste? \_\_\_\_\_
- 262.20(e) (2) Does the generator maintain a copy of the reclamation agreement in his files for at least three years after termination or expiration of the agreement? \_\_\_\_\_
- 262.21(a) Do generator's manifests include the following:  
Manifest document number? \_\_\_\_\_  
Generator name, mailing address, telephone number, EPA ID number? \_\_\_\_\_  
Transporter(s) name & EPA ID number? \_\_\_\_\_  
Facility name, address & EPA ID number & alternate facility info.(If applicable). \_\_\_\_\_  
Waste information required by DOT- shipping name, quantity (weight or vol.), containers (type & number), EPA waste code number? \_\_\_\_\_  
Emergency information: Special handling instructions, emergency phone numbers (optional)? \_\_\_\_\_
- 262.21(b) Is the following certification on each manifest form? \_\_\_\_\_  
This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of DOT, SCPSC, and SCDHEC.
- 262.23(a) (1) Does the generator sign and date all manifests? \_\_\_\_\_
- 262.23(a) (2) Did generator obtain handwritten signature and date of acceptance from transporter(s)? \_\_\_\_\_

262.23(a)(3) Does generator retain one completed copy of \_\_\_\_\_  
manifest signed by generator, transporter,  
and facility for three (3) years?

Subpart C - Pre-Transport Requirements (GPT)

Before transporting hazardous waste or offering hazardous waste for transportation off-site:

- 262.30 Does generator package waste in accordance with applicable DOT & PSC regulations? \_\_\_\_\_
- 262.31 Does generator label each package in accordance with the applicable DOT & PSC regulations? \_\_\_\_\_
- 262.32(a) Does generator mark each package of hazardous waste in accordance with the applicable DOT & PSC regulations on hazardous materials? \_\_\_\_\_
- 262.32(b) Does generator mark each container of 110 gallons or less used in transportation with the following or equivalent federal language and information: \_\_\_\_\_
- HAZARDOUS WASTE - Federal Law Prohibits improper disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.  
Generator's Name, & Address
- Manifest Document Number  
Date (accumulation start date)  
EPA Hazardous Waste Number
- 262.33 Does generator placard or offer the initial transporter the appropriate placards in accordance with applicable DOT & PSC regulations? \_\_\_\_\_

(GGR)

- 262.34(d) Has the generator accumulated HW on-site longer than 180 days? \_\_\_\_\_
- 262.34(d)(1) Is the generator storing more than 13,200 lbs. of HW? \_\_\_\_\_
- 262.34(f) Has the generator successfully petitioned for a 30 day extension for the accumulation of HW? \_\_\_\_\_
- 262.34(c) Does generator utilize satellite accumulation areas? \_\_\_\_\_
- Identify area & waste:
- \_\_\_\_\_
- \_\_\_\_\_
- 262.34(c)(1) If yes, does generator accumulate no more than 55 gallons of hazardous waste or no more than one quart of acutely hazardous waste at or near the point of generation? \_\_\_\_\_
- If yes, is the satellite storage container:
- 265.171 In good condition (e.g. no structural defects or severe rusting)? \_\_\_\_\_
- 265.172 Compatible with the hazardous waste to be stored? \_\_\_\_\_
- 265.173(a) Always kept closed except when adding or removing waste? \_\_\_\_\_
- 262.34(c)(1)(ii) If yes, is the satellite storage container marked with the words "HAZARDOUS WASTE"? \_\_\_\_\_

or with other words that identify the contents of the container?

262.34(c)(2) Does generator, within three days after accumulation comply with all regular generator standards for any amount of hazardous waste in excess of 55 gallons or any amount of acutely hazardous waste in excess of 1 quart collected and stored in a satellite accumulation area? \_\_\_\_\_

Subpart D - Record keeping and Reporting (GRR)

262.44(b) Does generator complete in accordance with the form's instructions and submit an Annual Report to the BLWM by January 31 of each year? \_\_\_\_\_

Quarterly, does the generator submit a check made payable to the Department for payment of a fee of \$34.00 per ton of Hazardous Waste and \$13.70 per ton of Solid Waste generated and disposed of in the State by land disposal? \_\_\_\_\_

262.42(b) Has generator ever failed to receive a completely signed manifest within 60 days of the date that the hazardous waste was accepted by the initial transporter? \_\_\_\_\_

Report with the BLWM within 60 days of the date that the hazardous waste was accepted by the initial transporter? \_\_\_\_\_

If yes, describe the conditions to necessitate the filing.

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262.40(b) If applicable, does owner or operator maintain a copy of the Exception Report for at least three (3) years? \_\_\_\_\_

262.40 Does generator maintain test results, waste analysis or other waste determinations made in accordance with section 262.11 for at least three (3) years? \_\_\_\_\_

Does generator have a waste minimization Program in place? \_\_\_\_\_

Subpart E - Special Conditions (GSC)

- Has generator ever shipped HW to a foreign country? \_\_\_\_\_
- 262.53(a) If yes, was the BLWM notified in writing sixty (60) days before the initial shipment of hazardous waste to each country in each calendar year? \_\_\_\_\_
- 262.54(a-I) Has generator complied with the manifest requirements specified in Subpart B 262.21(1-8) (above) except that no EPA ID No. will be available for the foreign consignee? \_\_\_\_\_
- Has generator ever received HW from a foreign source? \_\_\_\_\_
- 262.60(b) If yes, does generator comply with the manifest requirements specified in Subpart B 262.21(a) (1-8) except: \_\_\_\_\_
- In place of the generator`s name, address and EPA ID No., the name and address of the foreign generator and the importer's name, address and EPA ID No. must be used; and
- In place of the generator's signature on the certification statement, the U.S. importer or his agent must sign and date the certification and obtain the signature of the initial transporter?
- NOTE: If yes, does generator have interim status or permit to be a receiving facility? \_\_\_\_\_

Where applicable, has the following occurred:

- 262.55(a-c) Has generator (primary exporter) filed an exception report with the EPA Administrator and DHEC if: \_\_\_\_\_
- He has not received a signed copy of manifest (by the transporter) indicating date and place of departure from U.S. within forty-five (45) days? \_\_\_\_\_
- He has not received written confirmation by consignee of delivery within ninety (90) days? \_\_\_\_\_
- The waste was returned to the United States? \_\_\_\_\_
- 262.56 Has generator (as primary exporter) filed with EPA Administrator and DHEC, no later than March 1 of each year, an annual report summarizing information in 262.56(a) (1-6)? \_\_\_\_\_
- 262.57 Has the generator as the primary exporter for all exports performed the following: \_\_\_\_\_
- 262.57(a) (1) Kept a copy of each export notification for three (3) years from date hazardous waste was accepted by initial transporter? \_\_\_\_\_
- 262.57(a) (2) Kept a copy of each EPA Acknowledgement if correct for \_\_\_\_\_

three (3) years?

262.57(a) (3)

Kept a copy of each continuation of \_\_\_\_\_  
delivery for three (3) years?

262.57(a) (4)

Kept annual report copies for three \_\_\_\_\_  
(3) years?

Subpart H Hazardous Waste Discharge Reporting (GGR)

262.80 Has a hazardous waste discharge occurred \_\_\_\_\_  
during the course of generation,  
handling, storage and management?

If yes, describe the date and nature of the situation.

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262.80 Was immediate action taken to protect human \_\_\_\_\_  
health and the environment?

If yes, describe the action taken:

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262.80 Note: The action taken should have included  
notification, if required, of:  
National Response Center (800-424-8802 or 202-426-2675)  
DHEC (803-253-6488) (262.34(a)(4) and 265 Subpart D)

262.80 A discharge of hazardous waste must be cleaned \_\_\_\_\_  
up to the degree that it no longer presents  
a hazard to human health or the environment.  
Was this accomplished to the Department's  
satisfaction?

Personnel Training/Preparedness and Prevention (GGR)

262.34(d)(5) Is there at all times at least one employee \_\_\_\_\_

- (i) on the premises or on call with the responsibility for coordinating emergency response measures?

Does the generator post next to the phone:

- 262.34(d) (5) The name and telephone number of the \_\_\_\_\_  
(ii) (A) emergency coordinator?
- 262.34(d) (5) The location of fire extinguishers, \_\_\_\_\_  
(ii) (B) spill control equipment and fire alarm?
- 262.34(d) (5) The phone number of the fire department, \_\_\_\_\_  
(ii) (C) unless the facility has a direct fire alarm?

Subpart I - Use and Management of Containers (GRR)

- Are storage containers maintained free from:
- 265.171 Leaks? \_\_\_\_\_
- 265.171 Deterioration? \_\_\_\_\_
- 265.171 Structural defects? \_\_\_\_\_
- Are containers?
- 265.172 Compatible with the waste they contain? \_\_\_\_\_
- 265.173(a) Closed during storage, except to add or subtract waste? \_\_\_\_\_
- 265.173(b) Handled/stored in a way which may not cause leakage and/or rupture? \_\_\_\_\_
- 265.173(c) Permanently labeled: A Hazardous Waste - Federal Laws prohibit improper disposal. C? \_\_\_\_\_
- 265.173(d) Appropriately labeled as to their contents with an EPA Hazardous Waste Number? \_\_\_\_\_
- 265.174 Inspected at least weekly for leaks or deterioration? \_\_\_\_\_
- 265.177(a) Are incompatible wastes stored in the same containers? \_\_\_\_\_
- 265.177(b) Are hazardous wastes being placed in unwashed containers that previously held incompatible wastes or materials? \_\_\_\_\_
- 265.177(c) Are incompatible wastes separated by a barrier in the storage area? \_\_\_\_\_

Subpart J - Tanks (GGR)

Are tanks utilized for the storage and/or treatment of hazardous waste? \_\_\_\_\_

If ~~Yes~~C then continue with tank checklist,

If ~~No~~C then go on to next section.

NOTE: The following section applies only to small quantity generators who are treating and/or storing hazardous waste in tanks.

265.201(b) (1) Does the owner/operator comply with 265.17(b) of this section? \_\_\_\_\_

265.201(b) (2) Does the owner/operator ensure the integrity of the tank system? \_\_\_\_\_

265.201(b) (3) Is the tank system, if uncovered, operated with at least 60cm of freeboard? \_\_\_\_\_

265.201(b) (4) Is the tank system equipped with waste feed cutoff or bypass systems? \_\_\_\_\_

Are the following inspected:

265.201(c) (1) Discharge control equipment, daily? \_\_\_\_\_

265.201(c) (2) Monitoring data, daily? \_\_\_\_\_

265.201(c) (3) Tank levels, daily? \_\_\_\_\_

265.201(c) (4) Check tank weekly for detection of leaks or corrosion of fixtures and seams? \_\_\_\_\_

265.201(c) (5) Check weekly for leaks, erosion, wet spots, dead vegetation, around confinement structures (e.g., dykes)? \_\_\_\_\_

265.201(d) At closure, did the owner/operator remove all hazardous waste(s), discharge control equipment and discharge confinement structures? \_\_\_\_\_

265.201(e) (1) Have wastes been placed in tanks that not previously or immediately rendered non-ignitable? \_\_\_\_\_

265.201(e) (2) If ignitable wastes are treated or stored in covered tanks, are they in compliance with the buffer zone requirements outlined in Tables 2-1 through 2-6 of the NFPA? \_\_\_\_\_

Section 268 - Land Disposal Restrictions (GLB)

- Does the company generate, and/or manage on site, any HW subject to Land Disposal Restrictions (LDR)? \_\_\_\_\_
- 268.7 and Sub-part D Did the company properly identify and select the appropriate treatment standards for its LDR wastes? \_\_\_\_\_
- Does the company generate, manage, or receive (enter where appropriate):
- 268.30 Spent solvent and Dioxin containing wastes? \_\_\_\_\_
- 268.32 California List Wastes? \_\_\_\_\_
- 268.33 First Third Wastes? \_\_\_\_\_
- 268.34 Second Third Wastes? \_\_\_\_\_
- 268.35 Third Third Wastes? \_\_\_\_\_
- Have the HW been appropriately identified for the above categories? \_\_\_\_\_
- 268.7(a) (4) Has the company properly performed waste analysis and/or applied adequate knowledge of process to determine whether the LDR wastes exceed treatment standards? \_\_\_\_\_
- 268.7(a) (2) If restricted wastes exceeded treatment standards or are prohibited, did company provide and/or receive the required notification with each shipment including:
- EPA Hazardous Waste Number? \_\_\_\_\_
- Corresponding treatment standards/prohibitions? \_\_\_\_\_
- Manifest Document Number? \_\_\_\_\_
- Available Waste Analysis? \_\_\_\_\_
- 268.7 If restricted wastes did not exceed treatment standards or are not prohibited, did company provide and/or receive the required notice and certification including:
- EPA Hazardous Waste Number? \_\_\_\_\_
- Corresponding treatment standards/prohibitions? \_\_\_\_\_
- Certification that waste meets the treatment standards and prohibition levels? \_\_\_\_\_
- Manifest document number? \_\_\_\_\_
- Available waste analysis data? \_\_\_\_\_
- 268.7 If company's waste is subject to an exemption from a prohibition on the type of land disposal method used for the waste, did the company provide and/or receive the required notice that the waste may be land disposed including:
- EPA Hazardous Waste Number? \_\_\_\_\_
- Corresponding treatment standards/ \_\_\_\_\_

prohibitions?

Manifest document number? \_\_\_\_\_

Available waste analysis data? \_\_\_\_\_

268.7 Did the company retain in onsite files documentation to support his determination that the waste is or is not restricted? \_\_\_\_\_

268.7 Did the company retain in onsite, or received from, files for at least 5 years past the date the waste was last shipped offsite all notices, certifications, demonstrations, waste analysis data, and other relevant documentation? \_\_\_\_\_

268.7(a) If the company has tolling agreement(s) in place pursuant to 262.20(e):

Did the generator comply with the applicable notification and certification requirements of paragraph (a) of this section for the initial shipment of the waste subject to the agreement? \_\_\_\_\_

Does the generator maintain on-site a copy of the LDR notification and certification, together with the tolling agreement for at least three years after termination or expiration of the agreement? \_\_\_\_\_

268.50(1) Has the company (with generator status only) stored LDR wastes longer than 90 days? (If yes he must apply for a TSD permit) \_\_\_\_\_

268.50(2) Has the company (with TSD status) stored LDR wastes longer than 1 year? (If yes, he must show the need to accumulate to economically treat, recover or dispose) \_\_\_\_\_

Y = Yes  
N = No  
C = Concern  
N/A = Not Applicable