

COMPLIANCE MONITORING INSPECTION CHECKLIST
FOR
LARGE QUANTITY GENERATORS

South Carolina Department of
Health and Environmental Control
Bureau of Land and Waste Management
Compliance Monitoring Section

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SOUTH CAROLINA HAZARDOUS WASTE COMPLIANCE
INSPECTION CHECKLIST
OVER 1000 KG PER MONTH

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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: _____

262.12(a) Does generator have an EPA ID #? _____
If no, generator should complete notification
form 2701 and submit to DHEC.

Subpart B - Manifest (GMR)

262.20(a) Does generator manifest waste shipped _____
off-site using uniform hazardous waste
manifests?

262.20(e) Does the generator have a permit to transport _____
hazardous waste off site pursuant to
R61-79.263 of these regulations?
If yes, complete transporter checklist.

262.20(e) If no, does the generator utilize a _____
transporter who is permitted pursuant to
R61-79.263 of these regulations?

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 and Reporting (GGR)

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

262.30 A. Does generator package waste in accordance with applicable DOT & PSC regulations? _____

262.31 B. Does generator label each package in accordance with the applicable DOT & PSC regulations? _____

262.32 (a) C. Does generator mark each package of hazardous waste in accordance with the applicable DOT & PSC regulations on hazardous materials? _____

262.32 (b) D. 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 transporter the appropriate placards in accordance with applicable DOT & PSC regulations? _____

- 262.34(a) Has the generator accumulated HW on-site longer than 90 days? _____
- 262.34(a)(2) Are all less than 90 day containers marked with the proper accumulation date? _____
- 262.34(a)(5) Are containers stacked more than two high? _____
 If "Yes" to the above then does the company have written approval from the Department? _____
- 262.34(b) Has the generator successfully petitioned for a 30 day extension for the accumulation of HW? _____
- 262.34(a)(4) Does the generator comply with all the inspection log requirements stipulated in 265.15(d)? _____
- 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 A. In good condition (e.g. no structural defects or severe rusting)? _____
- 265.172 B. Compatible with the hazardous waste to be stored? _____
- 265.173(a) C. Always kept closed except when adding or removing waste? _____
- 265.34(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 - Recordkeeping and Reporting (GRR)

- 262.41 Does generator complete in accordance with the form's instructions and submit Quarterly Reports to the BLWM within thirty (30) days of the end of each calendar quarter? _____
- 262.40(b) Are these Quarterly Reports maintained by the generator for at least three (3) years? _____
- 262.45 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(a)(1) Has generator ever failed to receive a completely signed manifest within 35 days of the date that the hazardous waste was accepted by the initial transporter? _____
- 262.42(a)(2) If yes, has the generator filed an Exception Report with the BLWM within 45 days of the date that the hazardous waste was accepted by the initial transporter? _____
- If yes, describe the conditions to necessitate the filing.
- _____
- _____
- _____
- _____
- 262.40(b) If applicable, does owner or operator maintain a copy of the Exception Report for at least three (3) years? _____
- 262.40(c) 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? _____
- 262.43 Does generator submit a waste minimization report within 30 days after the end of the calendar year which includes the following: _____
- 262.43(c) A description of efforts undertaken during the year to reduce the volume and toxicity of the waste? _____

- 262.43(d) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to the previous year? _____
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? _____
- Had 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) (b) Has generator (primary exporter) filed an exception report with 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? _____
- 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 For all exports has primary exporter: _____
- 262.57(a) (1) Kept a copy of each export notification for three (3) years from date hazardous waste was accepted by the 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.

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

If yes describe the action taken:

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?

Subpart B Section 265 - Personnel Training (GGR)

265.16(a)(1) Do personnel complete a program of _____
classroom or on-the-job training?

If yes, complete the following:

265.16(a)(2) Is this program directed by a person _____
trained in HW management procedures?

265.16(a)(2) Does this training program include in- _____
struction which teaches facility personnel
hazardous waste management procedures
relevant to the positions in which they
are employed?

265.16(a)(3) Are personnel trained to respond _____
effectively to emergencies?

If yes, does training include where applicable:

265.16(a)(3)(i) Procedures for using, inspecting and _____
repairing emergency and monitoring
equipment?

265.16(a)(3)(ii) Key parameters for automatic waste _____
feed cut-off systems?

265.16(a)(3)(iii) Use of communication/alarm systems? _____

- 265.16(a) (3) (iv) Response to fires/explosions? _____
- 265.16(a) (3) (v) Response to GW contamination? _____
- 265.16(a) (3) (vi) Shutdown of operations? _____
- 265.16(b) Is training administered to employees in new positions within six (6) months? _____
- 265.16(c) Is an annual review of the initial training program conducted? _____
- Are the following written HW-related training records maintained for each employee:
- 265.16(d) (1) Name of employee and job title? _____
- 265.16(d) (2) Job description which must include skills, education, duties assigned? _____
- 265.16(d) (3) Type and amount of training administered? _____
- 265.16(d) (4) Documentation that training/job experience was received by employee? _____
- 265.16(e) Are training records for current personnel kept until closure? _____
- 265.16(e) Are training records for former employees kept for three (3) years? _____
- Subpart C Section 265 - Preparedness and Prevention (GGR)

Note: Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden releases of hazardous wastes or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (265.31)

Has it been demonstrated that certain equipment(s) (as listed below) are not required? _____

If yes, explain. _____

If no, are the following present:

- 265.32(a) Communication and alarm system? _____
- 265.32(b) Telephone and two-way radio? _____
- 265.32(c) Portable fire extinguisher and fire control equipment? _____
- 265.32(c) Spill control equipment? _____
- 265.32(c) Decontamination equipment? _____
- 265.32(d) Water reserve at adequate volume and pressure? _____
- 265.33 Is all equipment (if listed above) tested/maintained to assure proper operation? _____
- 265.34 Do employees who handle HW have immediate access to an alarm and _____

- communication device (if listed above)?
- 265.34 (b) Do employees working alone with HW have immediate access to an alarm and communication device (if listed above)? _____
- 265.35 Is aisle space adequate for unobstructed movement of emergency personnel and fire, spill and decontamination equipment (unless demonstrated to the Department otherwise)? _____
- 265.37(a) (1) Have arrangements been made to familiarize police fire and emergency response teams with the layout of the facility, entrances and evacuation routes? _____
- 265.37(a) (2) If applicable, has a primary police/fire emergency response team been assigned? _____
- 265.37(a) (3) Have arrangements been made to include state emergency response teams, contractors, and equipment as backup? _____
- 265.37(a) (4) Have arrangements been made to familiarize local hospitals with the HW handled? _____
- 265.37(b) If state or local authorities refuse to enter into such arrangements, is this documented in the operating record? _____

Subpart D Section 265 - Contingency Plans & Emergency Procedures (GGR)

- 265.51(a) Has industry developed a contingency plan? _____
- 265.52(b) Has industry developed an SPCC Plan? _____
- Do either of these plans include:
- 265.52(a) A description of the emergency re-
sponses personnel must follow? _____
- 265.52(c) Arrangements with police/fire de-
partment/hospitals/contractors/
state and local emergency response teams. _____
- 265.52(d) An updated list of names, addresses
and phone numbers (office and home)
of emergency coordinator/s? _____
- 265.52(d) Designation of a primary emergency
coordinator (if applicable)? _____
- 265.52(e) An updated list of all emergency
equipment? _____
- 265.52(e) The description and location of
such equipment and brief description
of its capabilities? _____
- 265.52(f) An evacuation plan could be necessary which includes:
1. A signal to begin evacuation? _____
 2. Evacuation routes and alternate
routes? _____
- Is an updated copy of the contingency plan:
- 265.53(a) Maintained at facility? _____
- 265.53(b) Submitted to local police/fire de-
partment/hopsitals/state and local
emergency response teams? _____
- 265.54 Is contingency plan amended and
updated as changes occur at the site
(or previous use of plan failed)? _____
- 265.55 Is an emergency coordinator on call/or
on site at all times? _____
- 265.52(a) Does the contingency plan include the
steps to be taken in possible
emergency situations? _____
- Has the operator ever implemented the
contingency plan? _____
- 265.56(j) If yes, was a written report of the in-
cident submitted to the Department
within 15 days? _____

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: ~~Hazardous Waste Federal Laws prohibit improper storage or 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? _____
- 265.175 Does the container storage area have a secondary containment system? _____
- If yes, is the system:
- 265.175(b) (1) Constructed of or lined with materials that are free of cracks or gaps and is sufficiently impervious to contain leaks, spills and accumulated precipitation until collected material is detected and removed? _____
- 265.175(b) (2) Placed on a base that is sloped or is the containment system designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids? _____
- 265.175(b) (3) Designed with sufficient capacity to contain 10% of the volume of containers or the volume of containers or the volume of the largest container, whichever is greater? _____
- 265.175(b) (4) Designed so that run-on into the containment system is prevented, unless the collection system has sufficient excess capacity in addition to that required in 265.175(b) (3)? _____
- 265.175(b) (5) Designed as to remove spilled and/or leaked waste and accumulated precipitation from the sump and/or collection area in a timely manner as to prevent overflow of the collection system? _____
- 265.176 Are ignitable or reactive waste _____

located at least 15 meters (50 feet)
from the facility's property line?

- 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)

- 265.190 Are tanks utilized for the storage and/or treatment of hazardous waste? _____

If yes:

A. Is the tank existing?
(Installation on or prior to July 14, 1986) _____

B. A new tank? _____

- 265.191(a) Does the existing tank system have secondary containment? _____

If no:

Has the owner/operator determined that the tank system is not leaking or is unfit for use? _____

Was an assessment conducted by January 12, 1988, and is it kept on _____

file at the facility?

At a minimum, did the assessment consider:

- 265.191(b) (1) Design standards, if available, according to which the tank and ancillary equipment are constructed? _____
- 265.191(b) (2) Hazardous characteristics of the waste(s) that have been or will be treated? _____
- 265.191(b) (3) Existing corrosion protection measures? _____
- 265.191(b) (4) Documented age of the tank system, if available? _____
- 265.191(b) (5) Results of a leak test, internal inspection or other tank integrity examination? _____
- 265.191(b) (5) (i) For non-enterable underground tanks, a leak test? _____
- 265.191(b) (5) (ii) For other than non-enterable underground tanks and for ancillary equipment, a leak test or an internal inspection and/or other tank integrity examination certified by an independent, qualified, registered P.E. that addresses cracks, leaks, corrosion and erosion? _____
- 265.192(a) Has the owner/operator of a new tank system or components ensured that the foundation, structural support, seams, connections, and pressure controls (if applicable) are adequately designed as to prevent collapse, rupture or failure? _____
- Has a written assessment of the tank system and ancillary equipment been certified by an independent, qualified, registered P.E.? _____

Does the assessment, at a minimum, include:

- 265.192(a) (1) Design standard(s) according to which the tank(s) and ancillary equipment is or will be constructed? _____
- 265.192(a) (2) Hazardous characteristics of the waste(s) to be handled? _____

For a new tank in which the external shell of a metal tank or any metal component of the tank system is or will be in contact with the soil or with water, a determination by a corrosion expert of:

- 265.192 (a) (3) (i) (A) Soil moisture content? _____
- 265.192 (a) (3) (i) (B) Soil pH? _____
- 265.192 (a) (3) (i) (C) Soil sulfides level? _____
- 265.192 (a) (3) (i) (D) Soil resistivity? _____
- 265.192 (a) (3) (i) (E) Structure to soil potential? _____
- 265.192 (a) (3) (i) (F) Influence of nearby underground metal structures? _____

265.192 Stray electric current? _____
(a) (3) (i) (G)

265.192 Existing corrosion-protection measures? _____
(a) (3) (i) (H)

The type and degree of external corrosion-protection that are needed to ensure the integrity of the tank system, consisting of one or more of the following:

265.192 Corrosion-resistant materials of construction such as special alloys or fiberglass-reinforced plastic? _____
(a) (3) (ii) (A)

Or

265.192 Corrosion-resistant coating? _____
(a) (3) (ii) (B)

Or

265.192 Electrical isolation devices? _____
(a) (3) (ii) (C)

265.192(a) (4) For underground tanks, has a design determination been made to ensure protection against potential damage from vehicular traffic? _____

Do design considerations ensure that:

265.192(a) (5) (i) Tank foundations will maintain the load of a full truck? _____

265.192(a) (5) (ii) Tank systems will be anchored? _____

265.192(a) (5) (iii) Tank systems will withstand the effects of frost heave? _____

265.192(b) Did the owner/operator ensure proper handling procedures during installation? _____

If yes, was the system or component inspected for the presence of any of the following:

265.192(b) (1) Weld breaks? _____

265.192(b) (2) Punctures? _____

265.192(b) (3) Scrapes of protective coatings? _____

265.192(b) (4) Cracks? _____

265.192(b) (5) Corrosion? _____

265.192(b) (6) Other structural damage? _____

265.192(c) Did the owner/operator, if applicable, use a noncorrosive, porous, homogeneous substance for backfill? _____

265.192(d) Did the owner/operator perform a test for tightness prior to installation, if applicable? _____

265.192(e) Is ancillary equipment supported and protected against physical damage and settlement, vibration, expansion or contraction? _____

265.192(f) Has the owner/operator provided the necessary corrosion protection necessary to ensure the integrity of the tank system? _____

- during the use of the tank system?
- 265.192(g) Does the owner/operator have on file at the facility, a copy of all applicable certifications with regard to design and installation of the tank system? _____
- 265.193(a) Is secondary containment provided? _____
- If yes, the system must be:
- 265.193(b)(1) Designed, installed and operated to prevent any migration of waste or accumulated liquids? _____
- 265.193(b)(2) Capable of detecting and collecting releases? _____
- At a minimum, secondary containment must be:
- 265.193(c)(1) Constructed or of lined with compatible materials with the waste to be placed in tanks, and provide sufficient strength and thickness to prevent failure? _____
- 265.193(c)(2) Placed on a solid foundation? _____
- 265.193(c)(3) Provided with a leak detection system? _____
- 265.193(c)(4) Sloped? _____
- Secondary containment must have one or more of the following:
- 265.193(d)(1) A liner? _____
- Or
- 265.193(d)(2) A vault? _____
- Or
- 265.193(d)(3) A double walled tank? _____
- Or
- 265.193(d)(4) An equivalent device approved by the Department? _____
- External liner systems must be:
- 265.193(e)(1)(i) Designed to contain 100% of the capacity of the largest tank within its boundary? _____
- 265.193(e)(1)(ii) Designed to prevent run-on? _____
- 265.193(e)(1)(iii) Free of cracks or gaps? _____
- 265.193(e)(1)(iv) Capable of preventing lateral as well as vertical migration of the waste? _____
- Vault systems must be:
- 265.193(e)(2)(i) Designed to contain 100% of the capacity of the largest tank within its boundary? _____
- 265.193(e)(2)(ii) Designed to prevent run-on? _____
- 265.193(e)(2)(iii) Constructed with chemical-resistant water stops in place at all joints, if applicable? _____
- 265.193(e)(2)(iv) Provided with a compatible, impermeable interior coating or lining? _____
- 265.193(e)(2)(v) Provided with a means to protect against _____

the formation of and ignition of vapors within the vault, if applicable?
265.193(e) (2) (vi) Provided with an exterior moisture barrier? _____

Double walled tanks must be:

265.193(e) (3) (i) Designed with an integral structure? _____

265.193(e) (3) (ii) Protected from both corrosion of the primary tank interior and the external surface of the outer shell? _____

265.193(e) (3) (iii) Provided with a built-in, continuous lead detection system? _____

265.193(f) Is ancillary equipment provided with full secondary containment? _____

265.193(g) Has the owner/operator received a variance from the above requirements by the Department? _____

265.194(a) Does the owner/operator place hazardous waste or treatment reagents in tank systems that could cause the tank, ancillary equipment or secondary containment to rupture, leak, corrode or otherwise fail? _____

265.194(b) Does the owner/operator use appropriate controls and practices to prevent spills and overflows? _____

265.194(c) Does the owner/operator comply with all requirements of 265.196 when a leak or spill occurs in the tank system? _____

Does the owner/operator, at least daily, during each operating day, inspect for the following:

265.195(a) (1) Overfill/spill control equipment? _____

265.195(a) (2) Aboveground portions of the tank system? _____

265.195(a) (3) Data gathered from monitoring equipment? _____

265.195(a) (4) Erosion or signs of releases? _____

265.195(b) (1) Has the owner/operator confirmed the proper operation of the cathodic protection system, within six months of installation, and annually thereafter? _____

265.195(b) (2) Are all sources of impressed current inspected and/or tested at least bimonthly? _____

265.195(c) Does the owner/operator document, in the operating record, inspections of the above? _____

265.196 Has the tank system or secondary containment ever leaked or been deemed unfit for use? _____

If yes, did the owner/operator satisfy the following:

265.196(a) Cessation of use? _____

265.196(b) Removal of waste from the tank system or secondary containment? _____

265.196(c) Containment of visible releases to the environment? _____

If yes, the owner/operator must:

- 265.196(c) (1) Prevent further migration of the leak or spill? _____
- 265.196(c) (2) Remove and properly dispose of any visible contamination of the soil and surface water? _____
- 265.196(d) (1) Notify the Department within 24-hours of detection? _____
- 265.196(d) (3) Within 30 days of detection, submit a written report to the Department? _____
- 265.196(e) Provision of secondary containment, repair, or closure? _____
- 265.196(f) Certification of major repairs? _____
- 265.197(a) At closure, did the owner/operator remove or decontaminate all system components and manage them as hazardous waste per the facility's closure plan as required in subparts G and H of this part? _____
- 265.197(b) Has the owner/operator demonstrated that the tank system must be closed as a landfill? _____
- 265.198(a) Does the owner/operator place ignitable or reactive waste(s) in the tank system? _____

If yes, are the waste(s) treated, rendered, or mixed before or immediately after placement in the tank system to:

- 265.198(a) (1) (i) No longer met the definition of ignitable or reactive? _____
- 265.198(a) (2) Stored or treated to protect from ignition or reaction? _____
- 265.198(a) (3) Used solely for emergencies? _____
- 265.198(b) Does the owner/operator provide for protective distances between the waste management area and any public access or property lines? _____
- 265.199(a) Does the owner/operator place incompatible waste(s) or materials in the same tank system? _____
- 265.199(b) Does the owner/operator obtain written, documented information verifying proposed treatment or storage of said waste(s)? _____
- 265.200(a) Does the owner/operator when treating or storing a hazardous waste that is substantially different from previously treated or stored waste conduct waste analysis and trial treatment or storage tests? _____
- 265.200(b) Does the owner/operator obtain written, documented information verifying proposed treatment or storage of said waste? _____

Subpart W - Drip Pads for Wood Treaters (GOR)

265.440 (a) Does the company use a drip pad(s) which conveys treated wood drippage, precipitation, and/or surface water runoff to an associated collection system (containing F032, F034 and/or, F035 listed HW)? _____

Were these pads constructed before December 6, 1990? _____

Did the company generate a design and enter into a binding financial agreement to construct drip pads prior to December 6, 1990? _____

NOTE: If "Yes" to either of the two previous questions, then the company has existing drip pads. If "No" to both questions, then the company has new drip pads.

Design and Installation of New Drip Pads

265.443(a) Are the following requirements being met:

265.443 (a) (1) Constructed of nonearthen materials, excluding wood and nonstructurally supported asphalt? _____

265.443 (a) (2) Sloped for drainage of wood drippage? _____

- 265.443 (a) (3) Curbed or have a berm around perimeter? _____
- 265.443 (c) (4) Impermeable across entire surface? _____
- 265.443 (a) (5) Sufficient structural strength and thickness? _____
- 265.443(b) After the deadline in 265.441(b) of this subpart, does the new or existing drip pad have:
- 265.443 (b) (1) (i-iii) An appropriately constructed and installed synthetic liner? _____
- 265.443 (b) (2) (i-iii) An appropriately designed, constructed, and maintained leakage detection system? _____
- 265.443(c) Does the drip pad(s) contain any cracks, gaps, corrosion, or other evidence of deterioration? _____
- 265.443(d) Has any drippage, liquids from precipitation, or other wastes run off the pad and/or collection system? _____
- 265.440(b) Is the drip pad(s) protected (or covered)? _____
If no then:
- 265.443 (e) (f) Is the drip pad(s) and system designed, constructed, and maintained so that runoff and runoff from a 24-hour, 25-year storm event are prevented from comingling? _____
- 265.443(g) Has the drip pad(s) been evaluated properly to ensure that the system satisfies the requirements of 265.443(a-f)? _____
- 265.443(h) Are measures taken to remove drippage and accumulation of precipitation from the collection system to prevent overflow onto drip pad(s)? _____
- 265.443(i) Are drip pad(s) surfaces cleaned properly at least once every seven days and documented in facility's operating log? _____
- 265.443(j) Are any drippages or other hazardous waste liquids tracked off the drip pad(s) as a result of usual activities? _____
- 265.443(k) Are treated materials left on drip pad(s) until all drippage has ceased? _____
Is this properly documented? _____
- 265.443(l) Are associated collection system units drained ASAP after storms to maintain design capacity? _____
- 265.443(m) Has operator ever detected a leak of the system that allowed a release of hazardous waste? _____
If yes, within a reasonably prompt period of time was the following accomplished?
- 265.443 Event recorded in the operating log? _____

- (m) (1) (i) _____
- 265.443 (m) (1) (ii) Immediately removed the drip pad(s) or affected portion(s) from service? _____
- 265.443 (m) (1) (iii) Determined repair steps and remediated leakage and established a clean up and repair schedule? _____
- 265.443 (m) (1) (iv) Notified the Department within 24 hours of discovery and provided a written notice of remediation plan to the Department within 10 days of discovery? _____
- 265.443 (m) (3) Provided the Department with a certification from an independent, qualified, registered professional engineer that remediations were accomplished in accordance with 265.443(m) (1) (iv). _____
- 265.443(n) Is appropriate information regarding drip pad operation maintained in the facility's operating log? _____

Assessment of Existing Drip Pads

- 265.441(a) Has the company evaluated its existing drip pad(s)? _____
- Has this evaluation been reviewed and certified by an independent, registered, professional engineer? _____
- Is this evaluation on file at the facility? _____
- Was this written evaluation filed no later than June 6, 1991? _____
- Does the evaluation properly address applicable aspects of 265.443? _____
- Is the evaluation reviewed, updated and re-certified annually? _____
- Is the age of the drip pad(s) documented in this evaluation plan? _____
- If yes, list the age(s) of the pad(s) _____
-
- Does the existing drip pad(s) meet the requirements of 265.443(b)? _____
- 265.441(b) If "No", the company must develop a written plan for upgrading the existing pad(s) to meet 265.443(b). _____
- Has this plan been reviewed, and certified by an independent, qualified, registered professional engineer? _____
- Was the plan submitted at least 2 years prior to the anticipated completion of upgrades? _____

NOTE: The company must complete repairs and upgrades for existing pads of known, documented age by June 6, 1993 or by the 15th anniversary of the pads (whichever is later). For existing pads of undetermined age, the company must repair and upgrade them by June 6, 1999. However, if the company is older than 7 years, the pads must be repaired or

upgraded by the time the company reaches 15 years of age, or by June 6, 1993 whichever comes later.

- 265.441 (b) (1) (2) Has the company complied with the above? _____
- 265.441(c) Has the company submitted to the Department, drawings illustrating the completion of upgrades and repairs? _____
- Was this submittal accompanied by a certification from an independent, qualified, registered professional engineer? _____

NOTE: If during this process for evaluating existing pad(s), the units are found to be leaking then 265.443(m) must be complied with or the units must be closed in accordance with 265.445.

Inspection of Existing and New Drip Pads

- 265.444(a) During construction or installation have liners and and cover systems been inspected for:
- Uniformity? _____
 - Damage? _____
 - Imperfections? _____
- After installation, have liners been certified to be in compliance with 265.443 by a certified PE? _____
- After installation have liners been inspected:
- To ensure tight seams and joints? _____
 - For tears? _____
 - For punctures? _____
 - For blisters? _____
- 265.444(b) While drip pad(s) is in operation, has it been inspected weekly for:
- 265.444 (b) (1) Deterioration of runoff and runoff control systems? _____
 - 265.444 (b) (2) Leakage? _____
 - 265.444 (b) (3) Deterioration of drip pad(s) surface? _____
- 265.445 Are drip pads addressed in closure/post-closure Plan? _____

NOTE: Company must close units in accordance with applicable requirements of 265.445.

Subpart DD - Containment Buildings (GOR)

- 265.1100 (a) Is the building completely enclosed and constructed of manmade materials of sufficient strength as not to fail due to the use of _____

heavy equipment, climactic conditions or contact with waste.

If the unit is used to manage liquids:

- | | | |
|-----------------------------|--|-------|
| 265.1100 (c) (1) | Is the primary barrier constructed of materials to prevent migration of hazardous constituents into the barrier? | _____ |
| 265.1100 (c) (2) | Is there a liquid collection system? | _____ |
| 265.1100 (c) (3) | Is there a secondary containment system with a adequate leak detection and liquid collection system? | _____ |
| 265.1100 (d) | Is the building free from fugitive emissions? | _____ |
| 265.1101 (c) (1) (i) | Is the primary barrier free from significant cracks or deterioration? | _____ |
| 265.1101 (c) (1) (ii) | Is the level of waste maintained at a level as not to exceed the height of the containment wall? | _____ |
| 265.1101 (c) (1) (iii) | Has an area been designated to decontaminate personnel and equipment? | _____ |
| 265.1101 (c) (1) (iii) | Is any rinsate for decontamination been collected and properly managed? | _____ |
| 265.1101 (c) (2) | Has a certification been obtained by a qualified registered professional engineer stating that the building design meets the requirements of paragraphs a - c of section 265.1101? | _____ |
| | Upon detection of a release of hazardous waste does the owner or operator: | |
| 265.1101 (c) (3) (i) (A) | Enter a record of the discovery in the facility operating log? | _____ |
| 265.1101 (c) (3) (i) (B) | Immediately remove the affected portion of the building from service? | _____ |
| 265.1101 (c) (3) (i) (C) | Determine what steps must be taken to repair the building? | _____ |
| 265.1101 (c) (3) (i) (D) | Notify the Department within 7 days of discovery of the condition? | _____ |
| 265.1101 (c) (3) (iii) | Notify the Department upon completion of all repairs? | _____ |
| 265.1101 (c) (4) | Is the data from leak detection and monitoring equipment inspected and recorded at least every 7 days? | _____ |

Section 268 - Land Disposal Restrictions (GLB)

- Does the company generate, and/or manage on site, and/or receive from offsite any HW subject to Land Disposal Restrictions (LDR)? _____
- 268.3 If the company is under ISS, or has a permit to treat, has it sought dilution as a substitute for treatment? _____
- Does the company have any of the following:
- 268.4 Treatment surface impoundment exceptions? _____
- 268.5 Case by case extentions to effective dates? _____
- 268.6 Petitions to allow land disposal? _____
- Does the company generate, manage, or receive mixed restricted wastes with different treatment standards? _____
- 268.41(b) If yes, did the company apply the most stringent treatment standard (of those in the mixture)? _____

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 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 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? _____
- 268.50(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