

**Conditionally Exempt Small Quantity Generator (CESQG)
Hazardous and Liquid Industrial Waste Overview...
Getting Ready for an Inspection**

This session is for:

- Generates less than 220 pounds of nonacute hazardous waste *in a calendar month* on the contiguous property
- Accumulates less than 2200 pounds of nonacute hazardous waste
- Accumulates less than 2.2 pounds of acute hazardous waste
- Generates and accumulates non hazardous liquid waste
- Generates and accumulates universal waste

Generator status summary begins on page 2-25.

Getting ready for an inspection, before an inspector shows up at your door...

Understand what inspectors are looking for at CESQG sites

- **Records**
 - Waste characterization
 - Manifests and shipping records
 - Is waste going to appropriate disposal sites
- **Waste handling & accumulation areas**
 - How much is being stored
 - Containers
 - Labeling
 - Are there any releases or air emissions violating AQD Part 55

What's next when getting ready for a WHMD waste inspection?

- Prepare to do a self inspection
 - Look at common violations
 - Download the inspection form(s) for your activities
 - Understand the basics about hazardous waste (page 2-12) and liquid industrial waste (page 2-9)
- Look at your records (waste characterization (page 2-20), notification and sited identification number (page 2-30), manifest and shipping records (page 2-32), authorization to discharge to WWTP (page 2-19 and Chapter 3)
 - Can you find them?
 - Are they organized?
 - Commonly mischaracterized wastes:
 - Sorbents (page 2-53)
 - Shop towels (page 2-54)
 - Solvents (page 2-55)
 - Aerosol cans (page 2-58)
 - Painting wastes and filters (page 2-59)
 - Sump, trench or pit sludge (Chapter 3, page 3-24)
 - Spent activated carbon media
 - Grinding swarf from metal working (page 2-62)
 - Sand blasting media (www.deq.state.mi.us/documents/deq-wmd-hwp-abrsvblst.pdf)
 - Antifreeze (page 2-62)
 - Light bulbs (page 2-52)
 - Used oil and filters (page 2-47)
 - Universal waste (page 2-16)
 - More in guidebook (pages 2-23 and 2-47)
- Walk through the facility
- Fix what you find wrong. Retrain employees.
- Congratulate employees for what they did right!

Finding inspection forms and common violations www.michigan.gov/deq/waste "Hazardous and Liquid Industrial Waste" "Hazardous and Liquid Industrial Waste Management" under the headings 'Information' and 'Forms'

Now check out the waste generation & accumulation areas...

- Are the containers managed properly? (page 2-40)
- Do you have good labeling and closed containers? (page 2-44)
- Do you use satellite accumulation? (page 2-45)
- Are containers protected from (page 2-42):
 - Weather
 - Fire
 - Physical damage
 - Vandals
- Do you see signs of leaks or staining?
- Any signs of vegetative damage?
- Have you exceeded 2200 pounds? (page 2-27)
- Have any local time limits been exceeded? (page 2-39)
- Do you handle universal wastes? (pages 2-16, 2-462-51, 2-52, 2-61, 2-62)
- Are you prepared to handle emergencies? (page 2-65 and Chapter 6)
 - Do you have the right emergency equipment for handling spills of your type of waste?
 - Do employees know what to do?
 - Do you know release reporting requirements?

What kind of inspection follow up is necessary?

- Respond according to the letter sent by WHMD
- Accompany inspector if have a second inspection
- Direct questions about the inspection or letter to the inspector who visited your facility.

NOTES: