

**Large Quantity Generator (LQG)  
Hazardous and Liquid Industrial Waste Overview...  
Getting Ready for an Inspection**

**This session is for:**

- Generates 2200 pounds or more of non acute hazardous waste *in a calendar month* on the contiguous property
- Accumulates 2.2 or more 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
  - Containment
  - Emergency preparedness

***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 (page 2-30), manifest and shipping records (page 2-32), land disposal restrictions (page 2-37), hazardous waste report previously called biennial report (page 2-38), authorization to discharge to WWTP (page 2-19 and Chapter 3), weekly inspection records (page 2-41), training (page 2-65)
  - 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](http://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](http://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 have secondary containment? (page 2-42)
- Do you see signs of leaks or staining?
- Any signs of vegetative damage?
- Have you exceeded 90 days accumulation time limit? (page 2-39)
- Do you handle universal wastes? (pages 2-16, 2-46, 2-51, 2-52, 2-61, 2-62)
- Do you meet VOC air emission control requirements? (page 2-43)
- Are you prepared to handle emergencies? (page 2-65 and Chapter 6)
  - Do you have written contingency plan?
  - 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:**