

**LQG HAZARDOUS &
LIQUID INDUSTRIAL WASTE
OVERVIEW...**

Getting Ready for an Inspection



This session is for facilities that...

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

Why does this program exist?



Excessive accumulation



Illegal disposal



Why are there inspections?

- **Meet EPA agreement on checking compliance**
- **Maintain federal authorization for implementing RCRA program**
- **Past and current regulatory non-compliance**

When does an inspector usually visit?



- **Routine compliance inspection**
- **DEQ received complaint**
- **Inspection requested by another DEQ Division or Agency**
- **Manifest or other record discrepancies**



What do inspectors look at?

■ **Records**

- Waste related (manifests & shipping records, LDR, weekly inspections, waste characterization, hazardous waste report)
- Emergency preparedness (employee training program and records, written contingency plan)

■ **Waste handling & accumulation areas**

- Containers, labeling, secondary containment
- Emergency equipment

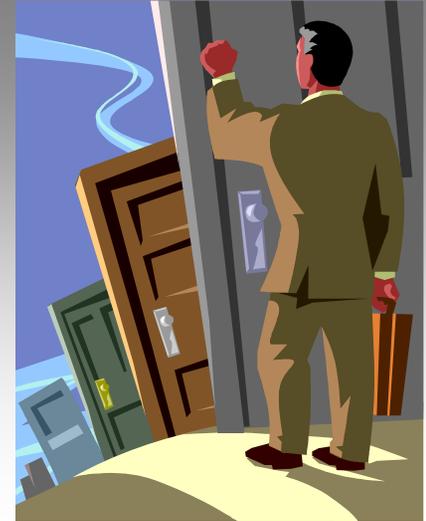
What can be done to help with the inspection?



- Put on your environmental hat
- Have records organized
- Relax!
- Don't be adversarial
- Don't try to "hide" anything
- If asked to "fix" something, consider doing it then if possible



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



- **Prepare to do a self inspection**
 - **Look at common violations**
 - **Download the inspection form(s) for your activities**
 - **Understand the basics about hazwaste (page 2-12) and liquid industrial waste (page 2-9)**

- **Look at your records**
 - **Can you find them?**
 - **Are they organized?**

- **Walk through the facility**

- **Fix what you find wrong. Retrain employees.**

- **Congratulate employees for what they did right!**

FINDING INSPECTION FORMS AND COMMON VIOLATIONS

Hazardous and Liquid Industrial Waste Management - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Back Forward Stop Home Search Favorites Media Refresh Print Mail W Options

Address http://www.michigan.gov/deq/0,1607,7-135-3312_4118_4240---,00.html

Google Search 11 blocked Check AutoLink AutoFill Options

WASTE

- Hazardous and Liquid Industrial Waste
- Hazardous and Liquid Industrial Waste Management**
- Household Hazardous Waste Collection
- Hazardous & Liquid Industrial Waste Transporters
- Low Level Radioactive Waste
- Medical Waste
- Radiological Protection
- Scrap Tires
- Solid Waste
- Waste Compliance & Enforcement

inside DEQ

- key topics
- news & events
- pollution prevention

AIR

LAND

WATER

TAPS

Michigan Timely Application and Permit Service

Hazardous Waste Management

Michigan Hazardous Waste Management Program Overview
The following documents are in Adobe Acrobat Portable Document Format (.pdf files). These files require the Adobe Acrobat Reader program which can be downloaded free from Adobe

Information

- [Dow Hazardous Waste Facility Operating License and Corrective Action Information](#)
- [Michigan Background Soil Survey \(July 2005\)](#) PDF
- [Resource Conservation and Recovery Act \(RCRA\) FY2006 Work Plan](#) PDF
- [Spill/Release Reporting](#)
- [Dow Partial Closure Plan for the 703 and 830 Incinerators](#) PDF
- [The DEQ Data/Criteria Comparison Program](#)
- [RCRA Voluntary Corrective Action Agreement Model](#)
- [EPA and DEQ November 3, 2000 Memorandum of Understanding and March 7, 2002 Technical Agreements on Corrective Action](#)
- [Hazardous Waste User Charges and Invoice Packets](#)
- [Closure and Corrective Action](#)
- [Environmental Disposal Systems, Inc. \(EDS\) Information Page](#)
- [Operational Memos](#)
- [Common Waste Generator Violations](#)
- [General Documents](#)
- [Spill Protection and Reporting](#)
- [Generators](#)
- [Disposal of Hazardous Waste Types](#)
- [Treatment, Storage and Disposal Facilities](#)

Laws & Rules

- [Statutes and Rules](#)

Online Services

- [Waste Data System \(WDS\)](#)
- [Michigan Manifest Tracking System \(MMTS\)](#)
- [Hazardous Waste Treatment, Storage and Disposal Facility Directory](#)

Financial Capability

- [Financial Assurance for Closure, Post-Closure, and Corrective Action](#)
- [Financial Responsibility for Liability Coverage](#)
- [Transfer Facility Liability Coverage](#)

Forms

- [Manifest Form Instructions](#) PDF
- [Manifest Form Ordering Information](#)
- [Hazardous Waste Program Forms and Permit Applications](#)
- [Hazardous Waste Program Inspection Forms](#)

Departments/Agencies

Online Services

Surveys

RSS Feeds

- DEQ Quick Links
- DEQ Calendar
- DEQ Acronyms PDF
- DEQ Laws and Rules
- DEQ Shortcuts
- Public Comments
- DEQ Staff Spotlight
- DEQ Forms
- DEQ Training & Workshops

Quick Links

- Contact Information for Hazardous Waste Management
- Groundwater Not In An Aquifer PDF
- Waste Compliance & Enforcement

Sign Now

to Lower Gas Prices!

OZONE ACTION!

EnviroFlash

Your Environmental News Flash

Michigan Week

MI Kids!

Use WHMD inspection forms (for your facility's generator activities) to do self audit

The screenshot shows a web browser window displaying the Michigan Department of Environmental Quality (DEQ) website. The address bar shows the URL: http://www.michigan.gov/deq/0,1607,7-135-3312_4118_4240-9203--,00.html. The page title is "Hazardous Waste Program Inspection Forms".

WASTE

- Hazardous and Liquid Industrial Waste
 - [Hazardous and Liquid Industrial Waste Management](#)
 - [Household Hazardous Waste Collection](#)
- Hazardous & Liquid Industrial Waste Transporters
- Low Level Radioactive Waste
- Medical Waste
- Radiological Protection
- Scrap Tires
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inside DEQ

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TAPS
Michigan Timely Application and Permit Service

Hazardous Waste Program Inspection Forms

Agency: Environmental Quality

These documents are intended solely for the guidance of governmental personnel and are not intended and cannot be relied upon to create rights, substantive or procedural, enforceable by any party in litigation with the State of Michigan or the United States.

- [Hazardous Waste Transporter Inspection Form EQP 5159](#), (4/2003)
- [Conditionally Exempt Small Quantity Generator Inspection Form EQP 5160](#), (4/2003)
- [Small Quantity Generator Inspection Form EQP 5161](#), (abbreviated) (4/2003)
- [Small Quantity Generator Tank System Inspection Form EQP 5162](#), (abbreviated) (4/2003)
- [Generator Inspection Form EQP 5163](#), (4/2003)
- [Generator Tank Inspection Form EQP 5188](#), (abbreviated) (4/2003)
- [Permitted Treatment, Storage, Disposal Inspection Form EQP 5166](#), (4/2003)
- [Interim Status Treatment, Storage, Disposal Inspection Form EQP 5171](#), (4/2003)
- [TSDF Generator Appendix Inspection Form EQP 5176](#), (5/2003)
- [Used Oil Inspection Form – Burn For Energy Recovery EQP 5179](#), (4/2003)
- [Used Oil Inspection Form – Collection Centers And Aggregation Point EQP 5189](#), (4/2003)
- [Used Oil Inspection Form – Fuel Marketer EQP 5181](#), (4/2003)
- [Used Oil Inspection Form – Generators EQP 5182](#), (4/2003)
- [Used Oil Inspection Form – Oil Processors And Re-Refiners EQP 5183](#), (4/2003)
- [Used Oil Inspection Form – Transporters And Transfer Facilities EQP 5184](#), (4/2003)
- [Universal Waste Large Quantity Handler \(LQH\) Inspection EQP 5185](#), (4/2003)
- [Universal Waste Small Quantity Handler \(SQH\) Inspection EQP 5186](#), (4/2003)

Departments/Agencies

- Online Services
- Surveys
- RSS Feeds

Related Content

- Manifest Form Instructions
- Manifest Form Ordering Information
- Hazardous Waste Program Forms and Permit Applications



Department of Environmental Quality Waste and Hazardous Materials Division
GENERATOR TANK INSPECTION FORM

Facility's Name _____ Part 3 Rules

Date _____ ID# _____ 1994 PA 45

____ abbreviated **FACILITY COMPLIANCE REQUIRED IN ALL AREAS**



Department of Environmental Quality, Waste and Hazardous Materials Division
GENERATOR INSPECTION FORM

Facility's Name _____ Part 3 Rules

Date _____ ID# _____ 1994 PA 451

NOTE: Rule

| HAZARDOUS WASTE AND WASTE # | SOURCE | HOW MUCH |
|-----------------------------|--------|----------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

NOTE: Re

5. A tank s

____ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

NI - Not Inspected N/A - Not Applicable)

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

YES NO

| | | | |
|--|-----|-----|--------|
| 1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)) | GGR | [] | NI N/A |
| a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c)) | GRR | [] | NI N/A |
| b) re-evaluated waste when changes in materials or process? (Rule 302(3)) | GGR | [] | NI N/A |
| 2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d):40 CFR 268.7(a)(5)) | GPT | [] | NI N/A |

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

Used Oil Generator



Department of Environmental Quality, Waste and Hazardous Materials Division
USED OIL INSPECTION FORM – GENERATORS

Facility's Name _____ Part 8 Rules

Date _____ ID# _____ 1994 PA 451

Note: *Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109*

APPLICABILITY (Rule 809)

NI – Not Inspected, N/A – Not Applicable

YES NO

| | YES | NO |
|---|-----|----|
| 1. Does the facility generate used oil and any of the following materials which are subject to regulation as used oil: | | |
| a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a)) | UOA | |
| b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b)) | UOA | |
| c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c)) | UOA | |
| d) mixture of used oil and fuel? (Rule 809(1)(d)) | UOA | |
| e) material which is produced from used oil & is burned for energy recovery? (Rule 809(1)(e)) | UOA | |
| f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1)(f)) | | |
| i) maximum arsenic concentration of 5ppm | UOA | |
| ii) maximum cadmium concentration of 2ppm | UOA | |



Department of Environmental Quality, Waste and Hazardous Materials Division
LIQUID INDUSTRIAL WASTE INSPECTION FORM

Facility's Name _____ Part 121

Date _____ ID# _____ 1994 PA 451

| LIQUID INDUSTRIAL WASTE AND WASTE # | SOURCE | HOW MUCH |
|-------------------------------------|--------|----------|
| | | |
| | | |

(NI - Not Inspected N/A - Not Applicable)

GENERATOR REQUIREMENTS

YES NO

| | | | |
|--|-----|-----|--------|
| 1. Generator complies with the waste evaluation requirements of Part 111, & rules promulgated under that part, & maintain records of the characterization? (Sec. 12103(1)(a)). | LWG | [] | NI N/A |
| 2. Generator obtained & utilized a generator identification number assigned by the USEPA or the DEQ? (Sec. 12103(1)(b)). | LWG | [] | NI N/A |

Next: Review your records



Can you find your characterization records?

- Do you have documentation how you determined what kind of waste you have (page 2-20)?
 - ✓ *If not, do you need to do waste survey (page 2-2)?*
- If samples were tested, did you get and keep a copy of lab results (page 2-21)?
- Suggestion if using MSDS is to have copy in waste files in addition to MIOSHA files
- Do you have records at least 3 years since last shipment or until investigation is resolved?

☹️ *Common Waste Characterization Violations*

☹️ Failing to properly identify ALL the listed and characteristic hazardous waste generated

☹️ Failing to have records and to keep them at least 3 years

☹️ Some 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)
- More in guidebook (pages 2-23 and 2-47)

Have you notified WHMD about regulated waste activities and is information current?

- Some people call this notification “getting an EPA number”
- Use Waste Data System (WDS) at www.deq.state.mi.us/wdsp
 - Find out notification, compliance history, submitted hw manifests
- Check company files
- Contact DEQ District Office that covers the area where facility is located for DEQ records

(page 2-30)

- WDS Online**
- Site ID
 - Site Identification
 - CME**
 - Compliance Actions
 - Evaluations
 - Violations
 - Manifests
 - Manifests
 - PCA
 - Corrective Actions
 - Permitting
 - TSD Permitted Waste
 - User Charges
 - User Charges

392522 / MID000718544 GENERAL MOTORS CORPORATION

Site Information

| | | | |
|-------------------------|---|---------------------------|----------------------------|
| Site ID | MID000718544 | Site Legal Name | GENERAL MOTORS CORPORATION |
| WMD ID | 392522 | Site Specific Name | GMC ORION ASSEMBLY |
| District | SOUTHEAST MICHIGAN | | |
| NAICS Codes | 336111 - Automobile Manufacturing | | |
| Location Address | 4555 GIDDINGS RD LAKE ORION, MI 48359 County: OAKLAND Country: U.S.A. | | |
| Mailing Address | PO BOX 1001 MC 483-900-201 LAKE ORION, MI 48361 County: OAKLAND Country: U.S.A. | | |

Previous Site Names

| Name | In-Active Date | Legal Name |
|--------------------|----------------|------------|
| GMC ORION ASSEMBLY | 12/2/2003 | No |

Site Owners / Operators

| Name | Org Type | Active | Inactive | Owner | Operator |
|----------------------------|----------|------------|----------|-------|----------|
| GENERAL MOTORS CORPORATION | Private | 10/19/2001 | | Yes | Yes |

Current Site Activities

| Discovery Date | Source | Activity |
|----------------|---------------------------|--|
| 2/27/2006 | Biennial Reporting (Site) | <p>Hazardous Waste Activities Large Quantity Generator</p> <p>Liquid Industrial Waste Activities LIW Generator</p> |

+ click to expand

Previous Site Activities

Site Comments

When determining your generator status

- Add up ALL the hazardous waste generated at the site in a calendar month
- Add up ALL the universal waste accumulated
- The amounts are calculated per site
- One site is under one identification number and is contiguous property
- Calculate the amount *generated*, not necessarily the amount *shipped*.

See page 2-22

☹️ *If waste is not properly characterized, you will fail to correctly notify WHMD about your regulated waste activities*

- Can cost facility additional annual user if notified as LQG and you are a SQG
 - LQG \$400 annual user charge
 - VLQG \$1000 annual user charge
 - \$8/hw manifest
- Can cost time and \$ meeting requirements that you would not be subject to (e.g. hazardous waste report)

How to notify or correct existing notification?

- **Initial notification**

- **Complete EQP5150; \$50 fee**
- **WHMD currently issues “MIK” Site Identification Numbers**

- **Subsequent notification**

- **Request prepopulated EQP5150 from WHMD**
- **Can be updated anytime**

Site ID Form (EQP 5150)

Commonly missed fields:

- NAICS
- Federal Identification Number
- Number of Employees
- Owner AND Operator
- Signature, Date

| | | | | | |
|---|--|--|--|---|--|
| <small>Required under authority of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to submit this information may result in civil or criminal penalties.</small> | | MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY Waste and Hazardous Materials Division SITE IDENTIFICATION | |  | |
| I. The form is being submitted CHECK CORRECT BOX(ES) <small>If submitting a subsequent notification you can contact the MDEQ-WHMD District or Lansing office for a pre-populated form. For locations and phone numbers go to www.michigan.gov/dep.</small> | | <input type="checkbox"/> as initial notification: to notify as a new site or new owner for the site. Mail this form and the user charge fee with either a receipt from paying the \$50.00 fee on-line using a MasterCard, VISA, or Discover Card (https://www.thepayplace.com/mi/dep/initial) or by check, made payable to the State of Michigan. Mail to MDEQ Revenue Office - HNLC, PO Box 30657, Lansing, MI 48909-8157. OR <input type="checkbox"/> as subsequent notification: to change, update, or verify site information for an existing owner of a site with a previously issued Site ID number. Mail directly to WHMD-MDEQ at WHMD-MDEQ, Notification Unit, PO Box 30241, Lansing, MI 48906-4197 if a fee is not required. Otherwise submit to MDEQ Revenue Office (see above). AND ANY OF THE FOLLOWING <input type="checkbox"/> as a component of a Hazardous Waste Permit Part A (submit to WHMD-MDEQ) <input type="checkbox"/> as a component of the Hazardous Waste (biennial) Report (submit to WHMD-MDEQ) | | | |
| II. Site's ID Number | | A. Site's Identification (ID) Number: | | | |
| III. Name of Site TYPE OR PRINT CLEARLY | | A. Legal Company Name: | | | |
| | | B. Site Specific Name (if/has): | | | |
| IV. NAICS for this site | | A. | | B. | |
| | | C. | | D. | |
| V. Site Location Address and Other Site Information TYPE OR PRINT CLEARLY | | Street Address line 1: | | | |
| | | Address line 2: | | City, Town, or Village: | |
| | | State, Province or Subdivision (2 letters): | | Country: | |
| | | County Name (MI only): | | Zip or Postal Code: - | |
| | | Tax Number: | | Approx / Ave Number of Employees: | |
| VI. Site Mailing Address TYPE OR PRINT CLEARLY | | Street Address line 1 or PO Box: | | | |
| | | Address line 2: | | State, Province or Subdivision (2 letters): | |
| | | City, Town, or Village: | | Zip or Postal Code: - | |
| | | Country: | | | |
| VII. Site Contact Person TYPE OR PRINT CLEARLY | | First Name: | | Last Name: | |
| | | Phone Number: () | | Phone number extension: | |
| | | email address: | | Fax number: () | |
| VIII. Indian Reservation | | Facility on Indian Reservation Land <input type="checkbox"/> yes <input type="checkbox"/> no | | | |

Can you find your manifests and shipping records?

- Uniform Hazardous Waste Manifest EPA 8700-22 is when hiring permitted and registered transporters to ship hazardous or liquid industrial waste
- Alternative shipping records

page 2-32

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST 1. Generator ID Number 2. Page 1 of 3. Emergency Response Phone 4. Manifest Tracking Number 000054511 FLE

5. Generator's Name and Mailing Address Generator's Site Address (if different than mailing address)

Generator's Phone: _____

6. Transporter 1 Company Name U.S. EPA ID Number _____

7. Transporter 2 Company Name U.S. EPA ID Number _____

8. Designated Facility Name and Site Address U.S. EPA ID Number _____

Facility's Phone: _____

| 1. Generator's Name and Mailing Address | 2. Page 1 of 3 | 3. Emergency Response Phone | 4. Manifest Tracking Number | 10. Containers | | 11. Total Quantity | 12. Unit (wt./vol.) | 13. Waste Codes |
|---|----------------|-----------------------------|-----------------------------|----------------|------|--------------------|---------------------|-----------------|
| | | | | No. | Type | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

14. Special Handling Instructions and Additional Information

15. GENERATOR/S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consignment. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Officer's Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____

16. International Shipments Import from U.S. Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____

Transporter 2 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____

18. Discrepancy

18a. Discrepancy Indication Spaces Quantity Type Residue Partial Rejection Full Rejection

18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____

Facility's Phone: _____

18c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

| 1. | 2. | 3. | 4. |
|----|----|----|----|
| | | | |

20. Designated Facility Owner or Operator: Certification of receipt of hazardous material covered by the manifest except as noted in item 18a

Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

Do you meet manifest and shipping record keeping requirements (page 2-32)?

- Do you have the manifest copy signed by the transporter and disposal company?
- Did you submit copy to WHMD by 10th of month following shipment?
- Do you have copies of your LDRs? (page 2-37)
- Are you keeping records at least 3 years from last shipment?
- The records must be retained longer in the event of a dispute, enforcement action, etc.

Do you realize you are certifying
you have waste minimization efforts
when you sign manifest?

Do you have receipts if hauling own waste off-site?

- **LQG may transport \leq 55 gallons of their own liquid industrial waste**

Records must be kept by generator & designated facility at least 3 years from shipment date:

1. A record of the source and quantity of waste and where it is being sent must accompany shipment
 2. Designated facility must sign for shipment acknowledging receipt
 3. Generator must provide designated facility with copy
 4. Designated facility must manage waste according to Part 121 requirements
- **To haul own hazardous waste, LQG needs to be credentialed waste transporter**

☹️ *Common manifest or shipping papers violations*

- Not having or finding signed manifest copies
- Not using correct site identification number
- Not listing all waste codes
- Failing to send in copies
- Not having receipts for used oil shipped on consolidated manifests
- Not having records when transporting own waste

Land Disposal Restrictions

- **Land Ban**
- **One time notice to TSDF (or until waste changes)**
- **Also applies to generators treating hw on site**
- **Keep copies at least 3 years**
- **Most TSDFs will provide form and help you meet this requirement**

Common LDR Violations for LQG

- ☹ **Failing to keep LDRs & related documents for at least 3 years after waste last sent to TSDF**
- ☹ **Missing land disposal restriction notification and waste analysis documents**
- ☹ **Missing or incomplete information such as categories, underlying hazardous constituents, and manifest numbers**
- ☹ **Listing LDR information that is inconsistent with waste characterization**

Do you records from WWTP authorizing discharges?

- Do discharges meet WWTP discharge limits?
- Do discharged solvents met **new** R 200.9203 limits?
- Does company have certified wastewater treatment plant operator?
 - E.g. Elemental neutralization

Do you have weekly inspection records?

- ☹️ Failing to conduct inspections weekly of areas and each operating day for tanks
- ☹️ Recommended to have written records

REQUIRED WEEKLY HAZARDOUS WASTE MAINTENANCE CHECKLIST

| | | | | | | | | | | | | | | | | | | | | |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| MONTH: YEAR: | | | | | | | | | | | | | | | | | | | | |
| WEEK # | 1 | 2 | 3 | 4 | 1 | 2 | 3 | 4 | 1 | 2 | 3 | 4 | 1 | 2 | 3 | 4 | 1 | 2 | 3 | 4 |
| Labeled | | | | | | | | | | | | | | | | | | | | |
| Dated | | | | | | | | | | | | | | | | | | | | |
| Containers Closed | | | | | | | | | | | | | | | | | | | | |
| Spills | | | | | | | | | | | | | | | | | | | | |
| Containment | | | | | | | | | | | | | | | | | | | | |
| Corrective Measures | | | | | | | | | | | | | | | | | | | | |
| Date | | | | | | | | | | | | | | | | | | | | |
| Initials | | | | | | | | | | | | | | | | | | | | |

- Labeled:** Check that all drums and all other containers are properly labeled ("Hazardous Waste" and waste number).
- Dated:** Check to see if the container is dated with the date accumulation began and the date on the container has not exceeded 90 or 180 days, which ever is applicable. If container date has exceeded 90 or 180 days, contact management.
- Containers Closed:** Make sure that containers are closed (i.e. both bungs are in drums, drum ring top is secure, funnel tops closed, funnel valve closed, or tarp over roll-off box).
- Spills:** Check that all containers are not leaking, bulged, or in poor condition. Are spills present?
- Containment:** Make sure that there hasn't been any degradation to the secondary containment, (i.e., any cracks, is coating sufficient?) (Is there enough set back distance of containers for squirt protection? Are all containers in the containment area?)
- Corrective Measures:** Are corrective measures needed?
- Date & Initials:** Inspector dates and initials.

On the back write comments on any areas above that were not in compliance (include the date). Also, record any measures being taken to correct the problems (include the date).

(rev. on 5/14/97 by-clz::doc\required weekly hazardous waste maintenance checklist. EAB)

Optional checklist available at expert area or on Internet

Do you have placards available if shipping 1000 pounds hw?

- **LQG must have USDOT placards available for transporters when have 1000 pounds in shipment [Rule 305(1)(e)]**
- **See Chapter 4 for transportation**
- **Michigan State Police Traffic Safety Division has more info about placarding**



Do you have copy of "Hazardous Waste Report"

- **Previously called Biennial Report**
- **WHMD mails facility report packet**
- **Keep 3 years from due date (March 1) of even numbered years**

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

Are the containers managed properly?

Do you have good labeling and closed containers?

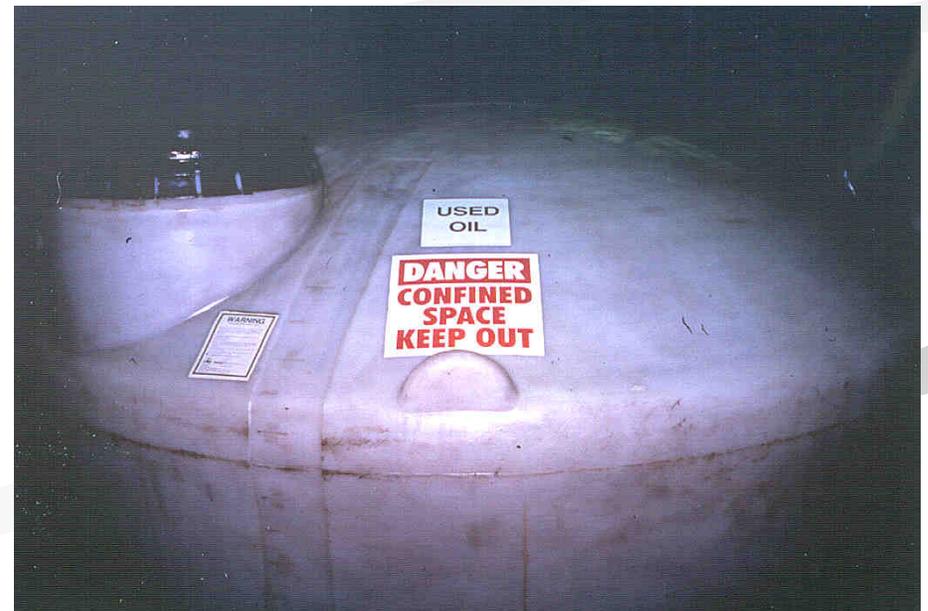


**Need “USED OIL”
on containers and pipes**

**ok to write or use stencils,
preprinted labels, etc.**

See Chapter 4 for
containment

Page 2-47



Do you use satellite accumulation?

- Do you have less than the maximum allowed volume for each satellite site? (total of 55 gallons of hazardous waste or one quart of acute or severely toxic hazardous waste)
- Are the containers at or near the point of waste generation?
- Are the satellite containers closed?

- **Do the satellite labels have...**
 - **The words “Hazardous Waste”?**
 - **Hazardous waste number or chemical name that identifies the contents on container?**

- **Did you forget to list the date the satellite containers reached the limit and failed to manage it under all of the applicable requirements?**



Satellite Label Example

Name &
address of
company, EPA
ID

Waste Code

No
accumulation
date

Orion Assembly
4555 Giddings Rd.
Orion, MI 48359
MID000718544

HAZARDOUS WASTE
FLAMMABLE
SOLVENT RAGS

EPA Waste Code: D001

Date Drum is Full: _____ Container Number 8468

In Case of Emergency Call Plant Security 5252
For Waste Pick Up Call 5926

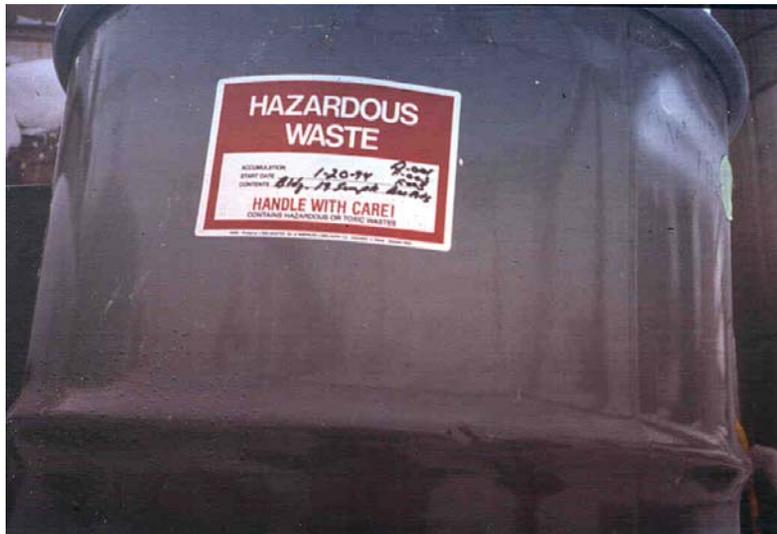
SOLVENT RAGS Container Number 8468

Waste Site Number: _____

Are your hazardous waste containers labeled correctly?

Do they have

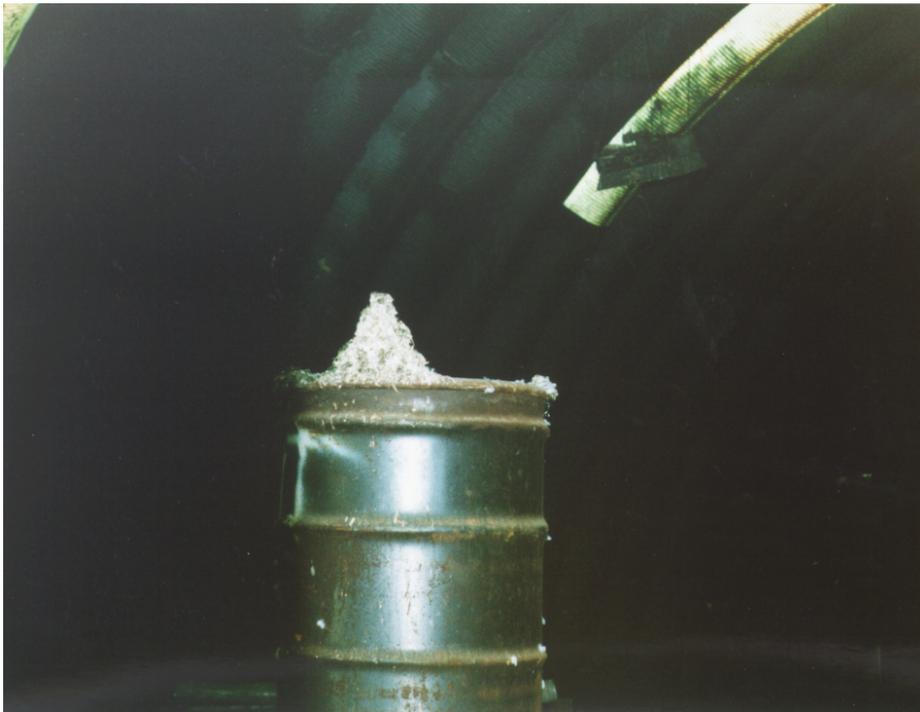
- Accumulation date?
- The words “Hazardous Waste”?
- Hazardous waste number(s)?



Storage label

Shipping label

Has the time limit of 90 days been exceeded?



Is there protection
from weather and
vandals?



**Install locks if
necessary**



page 2-40

Do you have holes in your security fencing?



Are containers closed?



Funnel must allow for closure of the container



**Notice the valve?
If kept closed would be ok.**



Notice the splashing on wall

Are containers in poor condition?



**Some bad containers
are obvious!**



Poor storage of lamps

Open &
Unmarked
boxes



Is the isolation distance being met?

- 50 feet from property line for storage of ignitable and reactive hazardous waste
- If not possible, have approval letter that storage meets local fire code?

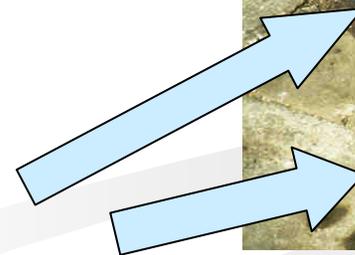
Are tanks
properly
supported?



Do you see signs of leaks or staining?



Look for staining as a sign



Any signs of vegetative stress and damage?



Do you have containment?

- Required for LQG
 - With any amount liquid hw
 - Specific F listed wastes (page 2-42)
- Are the containers elevated or floor sloped?
- Does it provide squirt protection?

See Page 2-43 and
Chapter 4 for more
information.



Secondary Containment

- Is the impervious base free of cracks?
- Can it hold 10% of the total volume or 100% of the volume of the largest container, whichever is greater?
- Have you prevented run-on?
- Have you removed any precipitation and other accumulated liquids?

Do you have RCRA air emission controls?

- Subpart AA
- Subpart BB
- Subpart CC
 - Does not apply to satellite containers

Do you know where all drains lead to?



Drains usually are not allowed in secondary containment areas.

Are containers in places they shouldn't be?



Are you prepared for an emergency?



Chapter 6

Do you have written contingency plan?

Are there arrangements with local authorities?

Hospital

Fire Department

Police

Emergency response contractor

Do you have written documentation plans submitted to local authorities?

Chapter 6

Are employees trained?

- **Formal annual training about handling hazardous waste, role in contingency plan**
- **Maintain records of training**
 - **Job title**
 - **Job description**
 - **Name of employee filling each job**
 - **Description of training**
 - **Training designed for emergency response**
 - **Trainer qualifications**
- **New personnel trained within 6 months**

Optional Emergency poster not required

- ❑ Name and phone numbers of emergency coordinator(s)
- ❑ Location of fire extinguishers, spill control equipment and fire alarm (if present)
- ❑ Phone number of the fire department (not needed if direct alarm)

HAZARDOUS WASTE EMERGENCY INFORMATION

| | | |
|---|-------------|--|
| EMERGENCY | NAME _____ | Map of facility with emergency equipment, spill equipment, exit routes, and alarm locations. |
| COORDINATOR | PHONE _____ | |
| ALTERNATE | NAME _____ | |
| | PHONE _____ | |
| FIRE DEPT. | PHONE _____ | |
| HOSPITAL | PHONE _____ | |
| POLICE | PHONE _____ | |
| Fire alarm is located: _____ | | |
| Spill control equipment is located: _____ | | |
| _____ | | |
| Fire extinguishers are located: _____ | | |
| _____ | | |

National Response Center: 1-800-424-8802
Michigan Pollution Emergency: 1-800-292-4706

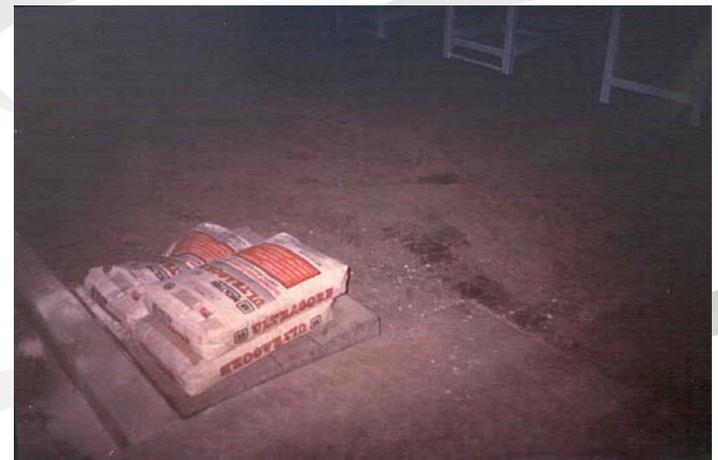
Other hazardous waste requirements may apply.

Provided by: The Environmental Assistance Division and the Waste Management Division of the Michigan Department of Environmental Quality
Environmental Assistance Center 1-800-662-9278

DEQ
EOP 3472

Do you have emergency equipment and is it maintained?

- Internal communication or alarm system
- Telephone or 2 way radios
- Fire extinguishers/ suppression system with adequate water/foam



Do you have adequate space or aisle width to properly inspect containers and for emergency personnel?

Recommended: Don't stack more than 2 drums high

Dunnage required under MIOSHA standard for flammable and combustible liquids



Leaning drums are safety issue!

What kind of inspection follow up is necessary?



- ☑ Respond according to the letter sent by WHMD

- ☑ Accompany inspector if have a second inspection



Have questions about the inspection or letter?

Call the inspector who visited your facility

Have general waste ? Call the Environmental Assistance Center 800-662-9278 for referral