

SQG HAZARDOUS &  
LIQUID INDUSTRIAL WASTE  
OVERVIEW...

Getting Ready for an Inspection



## This session is for facilities that...

- Generates 220 and less than 2200 pounds of nonacute hazardous waste *in a calendar month* on the contiguous property
- Accumulates 13,200 pounds or less 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

# *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, waste characterization)**
- **Emergency preparedness (employee training and procedures)**

### ■ **Waste handling & accumulation areas**

- **Containers, labeling, secondary containment**
- **Emergency equipment**
- **Emergency posting**

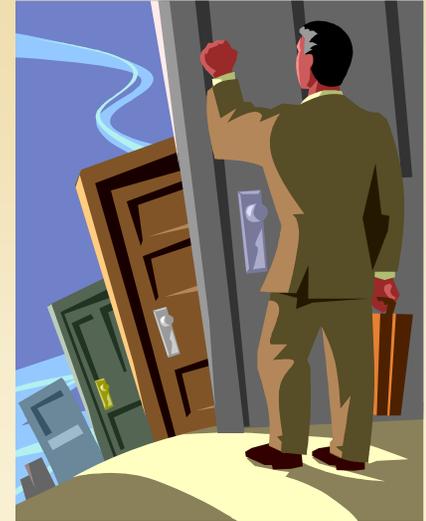
# *What can be done to help with the inspection?*



- 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 Refresh Home Search Favorites Media Print Mail News RSS

Address [http://www.michigan.gov/deq/0,1607,7-135-3312\\_4118\\_4240---,00.html](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](#)

### 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!

### 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

# 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](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
- 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 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  
**SMALL QUANTITY GENERATOR TANK SYSTEM INSPECTION FORM**

Facility's Name \_\_\_\_\_ Part 3 Rules

Date \_\_\_\_\_  
 \_\_\_\_\_ abbrevia



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

Facility's Name \_\_\_\_\_ Part 3 Rules

Date \_\_\_\_\_ ID# \_\_\_\_\_ 1994 PA 451

- 1. Has more  
5 of rules
- 2. Quantity c

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

- 3. Did the fa

NOTE: Rule 3

- 4. Take prec  
that threa
- 5. Is waste p
- 6. Did uncov

- a) equipp \_\_\_\_\_ abbreviated
- b) equipp

**FACILITY COMPLIANCE REQUIRED IN ALL AREAS**  
 NI - Not Inspected N/A - Not Applicable)

**WASTE DETERMINATION (Rule 302: 40 CFR 262.11)**

- 7. If waste is
- 8. Where pr
- a) discha
- b) monito

|   |     |     |        |
|---|-----|-----|--------|
| 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 |

**IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)**

|   |     |     |        |
|---|-----|-----|--------|
| 2. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12) | GGR | [ ] | NI N/A |
|---|-----|-----|--------|

**MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)**

|  |     |     |        |
|--|-----|-----|--------|
| 3. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f)) | GMR | [ ] | NI N/A |
| 4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))                    | GRR | [ ] | NI N/A |

# 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 using MSDS, do you have copy in waste files in addition to MIOSHA files?**
- **If samples were tested, did you get and keep a copy of lab results (page 2-21)?**
- **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](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)
- 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](http://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

User Charges

User Charges

393916 / MID006008395 EATON CORPORATION

Site Information

|                 |              |                           |                   |
|-----------------|--------------|---------------------------|-------------------|
| <b>Site ID</b>  | MID006008395 | <b>Site Legal Name</b>    | EATON CORPORATION |
| <b>WMD ID</b>   | 393916       | <b>Site Specific Name</b> | EATON CORP        |
| <b>District</b> | SAGINAW BAY  |                           |                   |

**NAICS Codes** 336312 - Gasoline Engine and Engine Parts Manufacturing

**Location Address**  
 1000 RUST AVE  
 SAGINAW, MI 48601-2801  
 County: SAGINAW  
 Country: U.S.A.

**Mailing Address**  
 1000 RUST AVE  
 SAGINAW, MI 48601-2801  
 County: SAGINAW  
 Country: U.S.A.

Site Owners / Operators

| Name       | Org Type | Active   | Inactive | Owner | Operator |
|------------|----------|----------|----------|-------|----------|
| EATON CORP | Private  | 1/1/1970 |          | Yes   | Yes      |

Current Site Activities

| Discovery Date | Source              | Activity   |
|----------------|---------------------|--|
| 2/20/2007      | Notification (Site) | <p><b>Hazardous Waste Activities</b><br/>Small Quantity Generator</p> <p><b>Liquid Industrial Waste Activities</b><br/>LIW Generator</p> |

## 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
  - SQG \$100 annual user charge
  - \$8/hw manifest in fiscal year
- Can cost time and \$ meeting requirements that you should 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

| Required under authority of the<br>Natural Resources and<br>Environmental Protection Act,<br>1994<br>PA 451, as amended. Failure to<br>submit this information may result<br>in civil or criminal penalties.   |   | MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY<br>Waste and Hazardous Materials Division   |     | DEQ   |  |
|--|---|--|-----|---|--|
| I. The form is being submitted   |   | SITE IDENTIFICATION  |     |   |  |
| CHECK CORRECT BOX(ES)<br><br>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 <a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> . | <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 ( <a href="https://www.thepayplace.com/mi/req/initial">https://www.thepayplace.com/mi/req/initial</a> ) or by check, made payable to the State of Michigan. Mail to MDEQ Revenue Office - HNUC, PO Box 30657, Lansing, MI 48929-3157. 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).   |     |   |  |
|  | <input type="checkbox"/>                    | 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<br><br>TYPE OR PRINT CLEARLY   | A. Legal Company Name:                      |  |     |   |  |
|  | B. Site Specific Name (if/blank):           |  |     |   |  |
| IV. NAICS for this Site  | A.  | B.   | C.  | D.  |  |
| V. Site Location Address and Other Site Information<br><br>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<br><br>TYPE OR PRINT CLEARLY  | Street Address line 1 or PO Box:            |  |     |   |  |
|  | Address line 2:                             |  |     |   |  |
|  | City, Town, or Village:                     |  |     | State, Province or Subdivision (2 letters): |  |
|  | Country:                                    |  |     | Zip or Postal Code: -                       |  |
| VII. Site Contact Person<br><br>TYPE OR PRINT CLEARLY  | First Name:                                 |  | MI: | 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. HM | 9a. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group, if any) | 10. Containers |      | 11. Total Quantity | 12. Unit (wt./vol.) | 13. Waste Codes |
|-------|---|----------------|------|--------------------|---------------------|-----------------|
|       |   | No.            | Type |                    |                     |                 |
| 1.    |   |                |      |                    |                     |                 |
| 2.    |   |                |      |                    |                     |                 |
| 3.    |   |                |      |                    |                     |                 |
| 4.    |   |                |      |                    |                     |                 |

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 Consent. 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

Manifest Reference Number: \_\_\_\_\_

18b. Alternate Facility (or Generator) 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 recordkeeping requirements (page 2-32)?

- Do you have the manifest copy signed by the transporter and disposal company?
- Did you submit copy to WHMD by 10<sup>th</sup> 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?*

- **SQG may haul  $\leq 55$  gallons of their own liquid industrial waste (not hazardous 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

## ☹️ *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 self hauling**

## *Common LDR Violations for SQG*

- ☹ **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**

# Have you done weekly inspections?

- ☹️ 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:<br>YEAR:     |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| WEEK #              | 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?*

- **SQG 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**

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

**Are the containers managed properly?**

Do you have good labeling and closed containers?

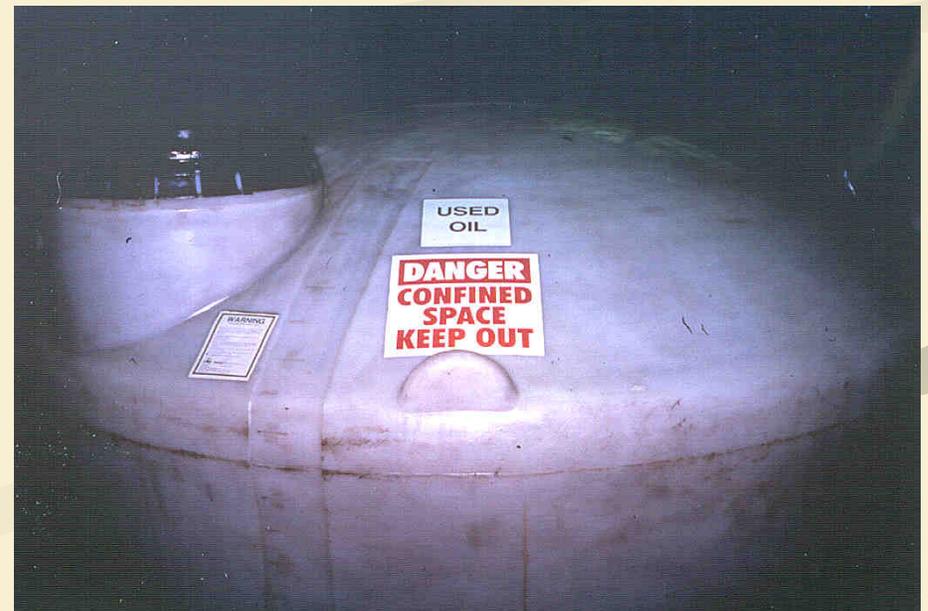


**Need “USED OIL”  
on containers and pipes**

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

See Chapter 4 for  
containment

Page 2-47



Or does it  
look  
something  
like this?



## 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?

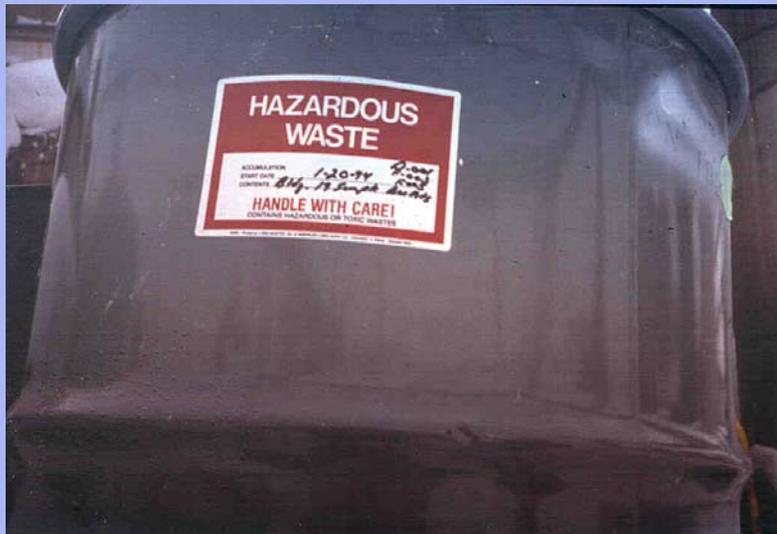
- **Do the satellite labels have...**
  - **The words “Hazardous Waste”?**
  - **Hazardous waste number or chemical name that identifies the contents on container?**
  
- **Did you forget to list the date the satellite containers reached the limit and failed to manage it under all of the applicable requirements?**



# Are your hazardous waste containers labeled correctly?

Do they have

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

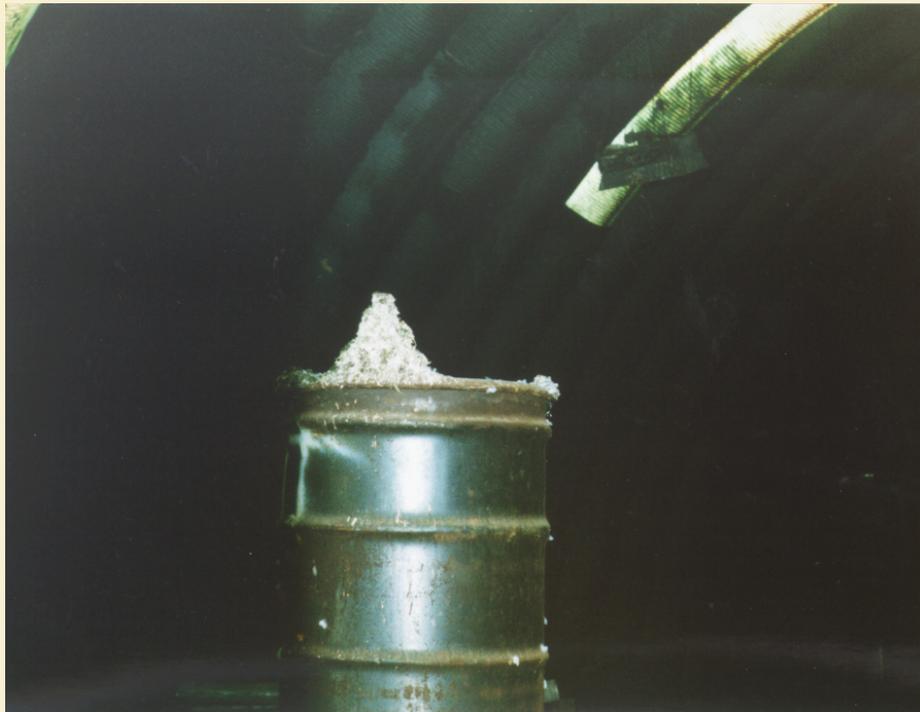


Storage label

Shipping label

Have you accumulated over 13,200 pounds of non acute hw?

Has the time limit of 180 days (unless shipping over 200 miles 270 days) been exceeded?



Is there protection from weather and vandals?



**Install locks if necessary**



# 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!**



Are tanks and containers properly maintained and supported when stacked?



Do you see signs of leaks or staining?



*Any signs of vegetative damage?*



# Do you have containment?

- Required for
  - SQG with over 2200#
- Are the containers elevated or floor sloped?
- Does it provide squirt protection?

**See Page 2-37 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 know where all drains lead to?**



**Drains usually are not allowed in secondary containment areas.**

*Are you prepared for an emergency?*



Chapter 6

## Do you have emergency plan & employees trained?

- **Informal training**
- **No stipulated review period**
- **Written training records not required**
- **Written plan not required, but are required to post information**

# Is your emergency information posted current?

- 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

# Or does your poster look more like this?

**HAZARDOUS EMERGENCY INFORMATION**

*3-9 Calc Shore Safe Work 00*  
*17 399 665 3011*  
*59 4124*  
*759 19153 PO 6468*

*292-5442*  
**EMERGENCY** Name Don Wilson *Kalich*  
*2410-630-2152-1128*  
**COORDINATOR** Phone 393-9176 *701843*  
*772-9100*  
**ALTERNATE** Name John Lorenze *702007*  
*Dean Both*  
**FIRE** :PT. Phone 392-7744 *703010516*  
*2400-40-248-54-3794*  
**POSTAL** Phone 911 *701887*  
*763-800-5110*  
**AL** Phone 911 *702884*  
*Ken Pomper*  
**alarm is located:** N/A *702011*  
*396-0805*  
*199-325*  
*414284*  
*mid. 616*  
*Ken 616-532-7995* *29.70*  
**Spill control equipment is located:** in *45.00*  
*206-729 DARS 353*  
**parts room** 540-3516 *772-0482*  
*638-7760*  
**Fire extinguishers are located:** outside  
**parts room door or closest one.**  
*1128*  
*DAVANT*  
*6-1002*

**MAP OF FACILITY EQUIPMENT, SPILL LOCATIONS.**

*McKay*  
*14549*  
*AC-43*  
**CU 485.5692**  
*392-6813*  
*Doug*  
*772-517-422-7813*  
*748-406*  
*624*  
*5713*  
*354-3140*  
*898*  
*654-42152*  
*8392*  
*1-666-396-6801*  
*16044*  
*1-800-733-8859*  
*Linda*  
*1-800-733-8859*  
*1-800-733-8859*  
*50074*  
*800-252-7848*  
*259*  
*45-008*  
*PR4*  
*366-4100*  
*517-868-3218*  
*751-6228*  
*511*  
*200*  
*5862*  
*438*  
*595-00*

**NATIONAL RESPONSE CENTER: 1-800-424-8802**  
**MICHIGAN POLLUTION EMERGENCY: 1-800-292-4706**  
**HAZCHEM SAFETY SERVICES**  
 1409 Emokedrift Lane Lansing, MI 48917  
**Phone: 1-517-323-3330**

**SC HS**

**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**

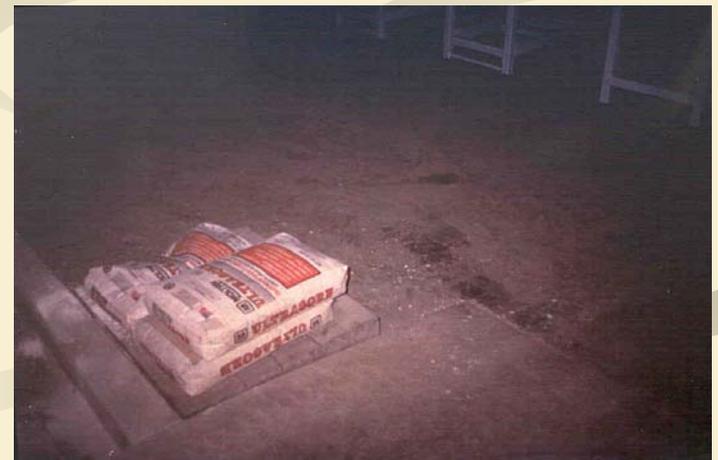
**Dunnage required under MIOSHA standard for flammable and combustible liquids**

**Leaning drum is a safety issue!**



# 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



Are there arrangements with local authorities?

**Hospital**

**Fire Department**

**Police**

**Emergency response contractor**

Chapter 6

# *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**