



MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

Materials Management Division

Permitted Treatment, Storage, Disposal Facility Inspection

Under the Authority of Part 111 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and Title 40 of the Code of Federal Regulations (CFR) 264, Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities

This document is used by EGLE inspectors and Treatment Storage and Disposal Facilities (TSDF) to determine compliance with Part 111 and 40 CFR Part 264.

Facility Name: _____

Inspection Date: _____ Site ID# _____ WDS#: _____

The following checked sections are included for this inspection:

Permitted Treatment, Storage, Disposal Facility Inspection

- Section 1 - General Environmental & Human Health Standards
- Section 2 - Reporting/Communication
- Section 3 - Waste Analysis
- Section 4 - Site Security
- Section 5 - Inspections
- Section 6 - Personnel Training
- Section 7 - Imported Wastes
- Section 8 - Ignitable/Reactive/Incompatible Wastes
- Section 9 - Manifests
- Section 10 - Preparedness and Prevention
- Section 11 - Contingency Plan & Emergency Procedures
- Section 12 - Operating Record
- Section 13 - Use & Management of Containers
- Section 14 - Environmental Monitoring
- Section 15 - Tank Systems

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Section 1 - General Environmental & Human Health Standards

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	General Environmental & Human Health Standards Part 111	C	NC	NI	NA
		TSDf is located, designed, constructed, and operated in a manner that will prevent:				
R 602(1)(a)	270.B	Violations of the federal clean water act or part 31				
R 602(1)(b)	270.B	Air emissions in violation of federal clean air act or Part 55				
R 602(1)(c)	270.B	Degradation (Part 31) of a sole-source aquifer				
R 602(1)(d)	270.B	Human/environmental exposure to harmful quantities of hazardous waste and waste constituents				
R 602(1)(e)	270.B	Pollution, impairment, destruction of natural resources of the state				
R 602(2)	270.B	Any (non-sanitary sewer) discharge to municipal sewerage systems meets the applicable pretreatment standards (comply w/ federal clean water act and Part 31)				
R 604(c)	270.B	Systems maintained to prevent hazardous waste/constituents from escaping into soils, surface or groundwaters, drains, or sewers				

Comments/Notes:

Section 2 - Reporting/Communication

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Reporting/Communication Part 111 & 40 CFR 264	C	NC	NI	NA
40 CFR 264.11	264.B	Facility has an EPA ID Number				
40 CFR 264.12(b)	264.B	TSDf has notified generators that facility has appropriate permits to accept waste(s).				
40 CFR 264.12(c)	264.B	Before any ownership transfers, notified (in writing) new operator of requirements under Parts 264 and 270				
R 610(1)	264.E	Facility submits biennial report				
R 610(2)	264.E	“Unmanifested Waste Report” submitted within 15-days				
R 610(3)	264.E	Treatment or disposal of on-site generated wastes reported quarterly				

NOTE: Rule 605(1) references the requirements of 40 CFR part 264 subpart B (264.10- 264.19; except 264.15(b)(5))

Comments/Notes:

Section 3 - Waste Analysis

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Waste Analysis Part 111 & 40 CFR 264.13	C	NC	NI	NA
40 CFR 264.13(a)(1)	264.B	Facility obtains detailed chemical and physical analysis of waste(s) prior to treatment/storage/disposal.				
40 CFR 264.13(a)(3)(i)	264.B	Analysis repeated when waste process or operation changes				
40 CFR 264.13(a)(3)(ii)	264.B	Analysis repeated if waste received does not match the waste designated on the manifest.				
40 CFR 264.13(a)(4)	264.B	Received waste(s) inspected to determine if it matches the identity of the waste specified on the accompanying shipping paper/manifest				
40 CFR 264.13(b)(1)- (5)	264.B	Facility developed and follows a written waste analysis plan that includes the following: <ul style="list-style-type: none"> <input type="checkbox"/> Parameters for which waste will be analyzed and rationale for selection of these parameters <input type="checkbox"/> Test & sampling methods to be used <input type="checkbox"/> The sampling method which will be used to obtain a representative sample of the waste to be analyzed. <input type="checkbox"/> Frequency of analysis will be reviewed or repeated to ensure analysis is accurate and up to date <input type="checkbox"/> Waste analyses that generators agree to supply 				
40 CFR 264.13(c)	264.B	Procedures to inspect off-site waste to ensure consistency with manifest				
40 CFR 264.13(c)(1)	264.B	Procedures to be used to determine the identity of each movement of waste				
40 CFR 264.13(c)(2)	264.B	Sampling method to be used to obtain a representative sample (when necessary)				

Section 4 - Site Security

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Site Security Part 111 & 40 CFR 264.14	C	NC	NI	NA
40 CFR 264.14(a)	264.B	The facility must prevent unknowing entry and minimize the possibility for the unauthorized entry of persons or livestock onto the active portion of the facility.				
40 CFR 246.14(b)(1)- (2)(i-ii) 264.14(c)	264.B	The facility must have: <input type="checkbox"/> 24-hour surveillance (246.14(b)(1)) OR <input type="checkbox"/> Artificial or natural barrier (i.e. fence) with means to control entry (264.14(b)(2)(i-ii)) AND <input type="checkbox"/> Danger sign(s) visible from ≥ 25-ft (264.14(c))				

Comments/Notes:

Section 5 - Inspections

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Inspections Part 111 & 40 CFR 264.15	C	NC	NI	NA
40 CFR 264.15(a)	264.B	Facility inspects for malfunctions, deterioration, operator error, discharges of hazardous waste that could lead to a release or impact human health				
40 CFR 264.15(b)(1)	264.B	Written schedule developed for inspecting: <ul style="list-style-type: none"> <input type="checkbox"/> Monitoring equipment <input type="checkbox"/> Safety and emergency equipment <input type="checkbox"/> Security devices <input type="checkbox"/> Operating and structural equipment (i.e. pumps, dikes) 				
40 CFR 264.15(b)(2)	264.B	Written inspection schedule kept at facility				
40 CFR 264.15(b)(3)	264.B	Schedule identifies problems that are looked for during the inspection (e.g. leaking, eroding, deterioration, malfunctions etc.)				
40 CFR 264.15(b)(4)	264.B	Schedule identifies inspection frequency, which should be based on potential equip deterioration				
40 CFR 264.15(b)(4)	264.B	Areas subject to spills (loading/unloading areas) inspected daily				
40 CFR 264.15(c)	264.B	Discovered deterioration or malfunctions must be remedied: <ul style="list-style-type: none"> <input type="checkbox"/> on a schedule that prevents development into an environmental or health hazard OR <input type="checkbox"/> Immediately if a hazard is imminent or has already occurred 				
40 CFR 264.15(d)	264.B	Inspection record logs maintained on site for 3-yrs and include: <ul style="list-style-type: none"> <input type="checkbox"/> Date & time of inspection <input type="checkbox"/> Name of inspector <input type="checkbox"/> Notation of observations <input type="checkbox"/> Date & nature of repairs or remedial actions 				

Comments/Notes:

Section 6 - Personnel Training

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Personnel Training Part 111 & 40 CFR 264.16	C	NC	NI	NA
40 CFR 264.16(a)(1)	264.B	Facility personnel complete training (classroom or on-the-job) that teaches hazardous waste compliance relative to the duties of job title				
40 CFR 264.16(a)(2)	264.B	Training conducted by qualified instructor				
40 CFR 264.16(a)(2)	264.B	Teaches hazardous waste management procedures (including contingency plan implementation) relevant to positions				
40 CFR 264.16(a)(3)(i-vi)	264.B	Designed to ensure personnel can respond to emergencies. Training familiarizes employees with: <ul style="list-style-type: none"> <input type="checkbox"/> Emergency procedures (i) <input type="checkbox"/> Emergency equipment & monitoring equipment (using, inspecting, repairing, etc.) <input type="checkbox"/> Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment (i) <input type="checkbox"/> Automatic waste feed cutoff (if applicable) (ii) <input type="checkbox"/> Communications or alarm systems (iii) <input type="checkbox"/> Response to fires or explosions (iv) <input type="checkbox"/> Response to ground-water contamination incidents (v) <input type="checkbox"/> Shutdown of operations (vi) 				
40 CFR 264.16(b)	264.B	Training is provided within 6-months and employees do not work unsupervised until trained.				
40 CFR 264.16(c)	264.B	Personnel participate in annual review of above training (initial training required by 264.14(a)).				
40 CFR 264.16(d)(1-4)	264.B	Facility maintains the following training documents for each position related to hazardous waste management: <ul style="list-style-type: none"> <input type="checkbox"/> Job title (1) <input type="checkbox"/> Name of employee filling each job (1) <input type="checkbox"/> Written job description (including requisite skill, education, qualifications & duties) (2) <input type="checkbox"/> Description of type and amount of introductory/continued training for job (3) <input type="checkbox"/> Records of training or job experience(4) 				
40 CFR 264.16(e)	264.B	Training records are maintained until closure or for 3-yrs after an individual's employment ends.				

NOTE: For employees that receive emergency response training under OSHA (29CFR 1910.120(p)(8) and 1910.120(q)) the facility is not required to provide separate emergency response training pursuant to this section provided that the overall facility training meets all the requirements of this section (264.16(a)(4)).

Comments/Notes:

Section 7 - Imported Wastes

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Imported Wastes Part 111, Rule 610 & 40 CFR 264.12	C	NC	NI	NA
40 CFR 264.12(a)(1)	264.B	Notified EPA ≥ 60-days prior to first shipment of hazardous waste departing from a foreign source (if exporter/importer didn't notify or if material is not a hazardous waste in country of export)				
40 CFR 264.12(a)(2) & R 608(4)	264.B	Provides signed movement document to foreign exporter, competent authorities of countries of export/transit, and to EPA electronically within 3-working days of receipt				
40 CFR 264.12(a)(2)	264.B	Maintains import movement documents on-site for 3-yrs (WIETS records acceptable)				
40 CFR 264.12(a)(4)	264.B	Sends copies of signed/dated confirmation of recovery/disposal (to foreign exporter, competent authorities of countries of export, and to EPA via WIETS) as soon as possible, but: <input type="checkbox"/> No later than 30-days after completing recovery/disposal AND <input type="checkbox"/> No later than 1-year after receipt of waste				
R 610(1)	264.E	Waste import information reported as part of biennial report				

NOTE: Facility may not be held liable for inability to produce electronic documents via WIETS due exclusively to technical difficulty with WIETS.

Comments/Notes:

Section 8 - Ignitable/Reactive/Incompatible Wastes

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Ignitable/Reactive/Incompatible Wastes Part 111 & 40 CFR 264	C	NC	NI	NA
40 CFR 264.17(a)	264.B	Ignitable/Reactive wastes separated/protected from ignition or reaction sources				
40 CFR 264.17(a)	264.B	“No Smoking” signs posted wherever there is a hazard from ignitable or reactive waste.				
40 CFR 264.17(b)(1-5)	264.B	Precautions taken to prevent reactions which could: <ul style="list-style-type: none"> <input type="checkbox"/> Generate heat, pressure, fire, explosion, or violent reactions (1) <input type="checkbox"/> Produce uncontrolled toxic mists, dusts, fumes, gases that could cause health risk (2) <input type="checkbox"/> Produce uncontrolled flammable gas/fumes that pose risk of fire/explosion (3) <input type="checkbox"/> Damage device or facility (4) <input type="checkbox"/> Threaten human health or environment (5) 				
40 CFR 264.17(c)	264.B	Compliance with above items is documented				

Comments/Notes:

Section 9 - Manifests

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Manifests Part 111 & 40 CFR 264	C	NC	NI	NA
R 605(2)	264.B	Facility has developed a procedure to (and implements as necessary) ensure hazardous waste transport vehicles/containers are emptied in accordance with R 207 (RCRA empty) OR any remaining waste is accompanied by a manifest upon departure				
R 608 40 CFR 264.71(a):	264.E	Facility takes following steps when hazardous waste is received on a manifest:				
40 CFR 264.71(a)(2)(i)	264.E	Sign & Date each copy of manifest				
40 CFR 264.71(a)(2)(ii)	264.E	Note any discrepancies on each copy				
40 CFR 264.71(a)(2)(iii)	264.E	Provide a signed copy to the transporter				
40 CFR 264.71(a)(2)(iv)	264.E	Within 30-days provide copy to generator				
40 CFR 264.71(a)(2)(v)	264.E	Submits copy to EPA e-manifest system within 30 days of date of delivery				
R 608(5)	264.E	Determine if consignment state of waste shipment requires any additional submission and comply				
R 608(2) 264.71(b)	264.E	Facility follows manifest requirements for bulk shipments of hazardous waste by rail/water				
R 608(12) 264.72(c)	264.E	Facility notifies the director of any manifest discrepancies that go unresolved for 20-days				

NOTE: Electronic manifests completed/transmitted in accordance with 40 CFR 262.20(a)(3) and used in lieu of paper manifests are the legal equivalent. R 608(6)

Comments/Notes

Section 10 - Preparedness and Prevention

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Preparedness and Prevention Part 111 & 40 CFR 264	C	NC	NI	NA
40 CFR 264.31	264.C	Facility designed, constructed, maintained, and operated to minimize possibility of fire, explosion, or release of hazardous waste				
40 CFR 264.32(a-d)	264.C	Facility equipped with the following: <input type="checkbox"/> Internal communication or alarm system (a) <input type="checkbox"/> Telephone or 2-way radio on scene of operations capable of summoning emergency assistance (b) <input type="checkbox"/> Portable fire extinguisher, fire control equipment, spill control equipment, decontamination equipment (c) <input type="checkbox"/> Adequate water volume for fire control (d)				
40 CFR 264.33	264.C	Emergency equipment listed above is tested and maintained as necessary to assure proper operation				
40 CFR 264.34(a)	264.C	Personnel have immediate access to emergency communication device or alarm during hazardous waste operations (pouring/mixing/etc.) *				
40 CFR 264.34(b)	264.C	If one employee is on premises while the facility is operating, they must have immediate access to device capable of summoning external assistance				
40 CFR 264.35	264.C	Aisle space maintained to allow unobstructed movement of personnel & fire/spill/decontamination equipment				
40 CFR 264.37(a)(1)	264.C	Facility must attempt to make arrangements to familiarize local police/fire/hospital/emergency teams with facility layout and potential hazards				
40 CFR 264.37(b)	264.C	Facility documents if authorities decline to enter into arrangements.				

NOTE: Access to emergency communication can be either directly or through visual or voice contact with another employee.

Comments/Notes:

Section 11 - Contingency Plan & Emergency Procedures

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Contingency Plan & Emergency Procedures Part 111 & 40 CFR 264	C	NC	NI	NA
R 607(2)	264.D	If there is a fire/explosion/release the facility must notify PEAS				
40 CFR 264.51(a)	264.D	Facility must have a contingency plan designed to minimize hazards to human health or the environment from fires/explosions/release				
40 CFR 264.51(b)	264.D	Provisions of the plan must be carried out in an emergency				
40 CFR 264.52(a, c, d, e, and f)	264.D	The site contingency plan must contain: <input type="checkbox"/> Actions personnel must take in response to an emergency situation (fire, release to air, soil, water, etc.) (a) <input type="checkbox"/> Description of arrangements made with local authorities (c) <input type="checkbox"/> Names, address(es), phone number(s) (home & office) of emergency coordinators (d) <input type="checkbox"/> List of facility emergency equipment with location & outline of capabilities (e) <input type="checkbox"/> Evacuation plan with signals, routes, and alternate route information (f)				
40 CFR 264.53(a-b)	264.D	Copy of the contingency plan must be: <input type="checkbox"/> Maintained on-site (a) <input type="checkbox"/> Submitted to local emergency services (b)				
40 CFR 264.54(a-e)	264.D	Contingency plan must be amended whenever: <input type="checkbox"/> The operating license is revised (a) <input type="checkbox"/> The plan fails in an emergency (b) <input type="checkbox"/> The facility changes – design, construction, operation, maintenance, or other circumstance (c) <input type="checkbox"/> The list of emergency coordinators changes (d) <input type="checkbox"/> The list of emergency equipment changes (e)				
40 CFR 264.55	264.D	At least one emergency coordinator must be on-site or on-call at all times; with authority to commit necessary resources to carry out contingency plan				
40 CFR 264.55	264.D	Emergency coordinator(s) must be familiar with facility's contingency plan, wastes, records, facility layout.				

CITATIONS	WDS	Contingency Plan & Emergency Procedures Part 111 & 40 CFR 264	C	NC	NI	NA
40 CFR 264.56(a)(1- 2) and (b)	264.D	<p>In an emergency situation, the emergency coordinator must immediately:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Activate alarm or emergency communication to notify all facility personnel (a)(1) <input type="checkbox"/> Notify state/local authorities if their assistance is needed (a)(2) <input type="checkbox"/> Identify and report any releases and assess their potential impact on human health and the environment (b) 				

Comments/Notes:

Section 12 - Operating Record

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Operating Record Part 111 & 40 CFR 264	C	NC	NI	NA
R 609(1)(a) and (b)	264.E	Operating record contains the following items (maintained until closure):				
40 CFR 264.73(b)(1)	264.E	Description/quantity of each hazardous waste received; method/date of treatment/storage/disposal at facility				
40 CFR 264.73(b)(2)	264.E	Location of wastes within the facility (and quantities); cross referenced to manifests; including map/diagram				
40 CFR 264.73(b)(3)	264.E	Waste determinations and analyses				
40 CFR 264.73(b)(4)	264.E	Summary reports/details of any contingency plan incidents				
40 CFR 264.73(b)(6)	264.E	Monitoring, testing, corrective action data				
40 CFR 264.73(b)(8)	264.E	Closure/post-closure costs estimates				
40 CFR 264.73(b)(10)	264.E	Quantity/date of any waste placed in land disposal unit with extension to the LDR.				
40 CFR 264.73(b)(18)	264.E	Required incinerator monitoring data.				
40 CFR 264.73(b)(19)	264.E	P.E. certifications for tanks system repairs				
R 609(2)	264.E	Operating record contains the following items (maintained for 3 years):				
40 CFR 264.73(b)(5)	264.E	Facility Inspection records				
40 CFR 264.73(b)(7)	264.E	Notice to generators (waste acceptance)				
40 CFR 264.73(b)(9)	264.E	Annual waste minimization certification				
40 CFR 264.73(b)(11) & 40 CFR (13)&(15)	264.E	Off-site treatment, storage, land disposal; copy of generator's LDR data/certification				
40 CFR 264.73(b)(12) & (14)&(16)	264.E	On-site treatment, storage, land disposal; LDR notice data (except manifest #)/certification				

CITATIONS	WDS	Operating Record Part 111 & 40 CFR 264	C	NC	NI	NA
40 CFR 264.73(b)(17)	264.E	Site remediation records (if applicable)				
R 609(3)	264.E	Required records available for review				

Comments/Notes:

Section 13 - Use & Management of Containers

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Use & Management of Containers Part 111 & 40 CFR 264 Subpart I	C	NC	NI	NA
R 614(1)(b)	264.I	Each container must be marked with: <input type="checkbox"/> The words “Hazardous Waste” <input type="checkbox"/> Hazardous waste number(s)				
		Containers must be:				
40 CFR 264.171	264.I	In good condition				
40 CFR 264.172	264.I	Compatible with their waste(s)				
40 CFR 264.173(a)	264.I	Stored closed when not in use				
40 CFR 264.173(b)	264.I	Managed to prevent rupture/leaks				
40 CFR 264.174	264.I	Inspected weekly for deterioration/leaks				
40 CFR 264.175(b)(1-5) and 264.175(d)	264.I	Containment areas, storing any containers w/ Liquids or F020-F023, F026, F027 wastes, must have: <input type="checkbox"/> An impervious base, free of cracks/gaps <input type="checkbox"/> Sloped or designed to elevate containers to protect from accumulated liquids <input type="checkbox"/> Capacity to hold 10% of total container volume or volume of largest container (whichever is greater) <input type="checkbox"/> Sufficient excess capacity or prevent run-on <input type="checkbox"/> Accumulated liquids/wastes removed in a timely manner to prevent overflow				
40 CFR 264.175(c)(1-2)	264.I	Containment areas with only solids must be sloped or designed to elevate containers to protect from accumulated liquids				
40 CFR 264.176	264.I	Ignitable/Reactive waste stored > 50 ft from property line				
40 CFR 264.177(a)	264.I	Incompatibles stored in separate containers				
40 CFR 264.177(b)	264.I	Waste must not be placed in unwashed containers that previously held incompatible wastes				
40 CFR 264.177(c)	264.I	Incompatible wastes must be separated by physical barriers or sufficient distance				

CITATIONS	WDS	Use & Management of Containers Part 111 & 40 CFR 264 Subpart I	C	NC	NI	NA
40 CFR 264.179	264.I	All containerized waste must comply with the air emission requirements of subparts AA, BB, and CC				

Comments/Notes:

Section 14 - Environmental Monitoring

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Environmental Monitoring Part 111 Rule 611	C	NC	NI	NA
R 611	264.F	Facility has carried out their environmental monitoring program, if applicable.				

Section 15 - Tank Systems

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Tank Systems Part 111 & 40 CFR 264 Subpart J	C	NC	NI	NA
R 615	264.J	TSDf that treat or store in tank systems complete "TSDf Tank Inspection Form"				

Comments/Notes: