

**Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER
(SQH) INSPECTION**

Facility Name _____ Part 2 Rules

Date _____ I.D. # _____ 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

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

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)

YES NO

1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	___ [] NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	___ [] NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4))

QTY HANDLED: _____

3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	[] ___ NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	[] ___ NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). [USE TANK CHECKLIST])	273.B	[] ___ NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	[] ___ NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(iii))	273.B	[] ___ NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) requirements)

QTY HANDLED: _____

8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a))	273.B	[] ___ NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	[] ___ NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	[] ___ NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[] ___ NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[] ___ NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	[] ___ NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	[] ___ NI N/A

CONSUMER ELECTRONICS: (Rule 228(4))

QTY HANDLED: _____

13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	[] ___ NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	[] ___ NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii))	273.B	[] ___ NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse(Rule 228(4)(g)(i)); remove other univ. wastes from cons. electronics (Rule 228(4)(g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii))	273.B	[] ___ NI N/A

ELECTRIC LAMPS: (Rule 228(4) ;273.13(c);273.14(d))**QTY HANDLED:** _____

17. Are lamps crushed or broken and facility trying to manage as universal waste? (universal waste electric lamps shall not be crushed or broken under MI rule) (Rule 228(4)(c)(i)) Note: different from EPA regulation	273.B	___ <input type="checkbox"/> NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4)(c)(ii))	273.B	<input type="checkbox"/> ___ NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(S)" or "USED ELECTRIC LAMP(S)". (Rule 228(4)(c)(iv)) Note: different from EPA regulation	273.B	<input type="checkbox"/> ___ NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) Note: different from EPA regulation	273.B	<input type="checkbox"/> ___ NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii) (B)) Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste	273.B	<input type="checkbox"/> ___ NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	<input type="checkbox"/> ___ NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	<input type="checkbox"/> ___ NI N/A

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14**QTY HANDLED:** _____

22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	<input type="checkbox"/> ___ NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	<input type="checkbox"/> ___ NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S)" or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)".(Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	<input type="checkbox"/> ___ NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	<input type="checkbox"/> ___ NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	<input type="checkbox"/> ___ NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	<input type="checkbox"/> ___ NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	<input type="checkbox"/> ___ NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	<input type="checkbox"/> ___ NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(viii))	273.B	<input type="checkbox"/> ___ NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	<input type="checkbox"/> ___ NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i)(A&B), 273.13(c)(4)(i))	273.B	<input type="checkbox"/> ___ NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	<input type="checkbox"/> ___ NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	<input type="checkbox"/> ___ NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)**QTY HANDLED:** _____

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	<input type="checkbox"/> ___ NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	<input type="checkbox"/> ___ NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? [USE TANK CHECKLIST] (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	<input type="checkbox"/> ___ NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	<input type="checkbox"/> ___ NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(S)" or "WASTE-PESTICIDE(S)" (Rule 228(4)(a): 40 CFR 273.14(b) [See 273.14(c) if 273.14(b) not possible])	273.B	<input type="checkbox"/> ___ NI N/A

PHARMACEUTICALS: (Rule 228(4))**QTY HANDLED:** _____

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	<input type="checkbox"/> ___ NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	<input type="checkbox"/> ___ NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
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RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18)

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
45. If the SQH self-transport waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) OR	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a):40 CFR 273.18(g))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	<input type="checkbox"/> __ <input type="checkbox"/> NI N/A

