



MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

Materials Management Division

Small Quantity Generator Inspection

Under the Authority of Part 111, Hazardous Waste Management, and Part 121, Liquid Industrial By-Products, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and Title 40 of the Code of Federal Regulations (CFR) Part 262, Standards Applicable to Generators of Hazardous Waste

This document is used by EGLE inspectors and waste generators to determine compliance with Part 111 and Part 121

Facility Name: _____

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

The following checked sections are included for this inspection. If not checked, that section is left intentionally blank:

- Section 1: Generator Inspection Requirements
 - Waste Determination
 - Generator Category Determination
 - Site Identification Number
 - Manifest Requirements
 - Land Disposal Restrictions and Waste Minimization Certification
 - Recordkeeping/Reporting
- Section 2: Satellite Accumulation
- Section 3: Accumulation Requirements
- Section 4: Episodic Generation

Waste Determination

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

CITATIONS	WDS	Waste Determination Part 111	C	NC	NI	NA
R302(1) as defined in R202	262A	A person who generates a waste shall make an accurate determination if that waste is a Hazardous Waste (HW) to ensure the waste is properly managed under these rules				
R302(3)	262A	If the waste is determined to be hazardous, the generator has identified ALL applicable HW numbers				
R302(4)	262A	Generator will re-evaluate waste (immediately) due to changes in the materials or processes involved in its generation				

Note: The HW determination for each waste must be made at the point of waste generation, before dilution, mixing, or other alteration of the waste occurs, and at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors that may change the properties of the waste such that the classification of the waste under these rules may change. Part 111, Rule 302(1)(a).

Note: Generator knowledge may be used in making the decision of waste determination. When generator knowledge is inadequate to make accurate determination, the generator shall test the waste accordingly. Part 111, Rule 302(1)(d)(i)(ii).

Note: A small generator that is requested by the director to submit any of the information in Rule 311 (1) of this rule shall provide the required information within 30 days after receipt of the request.

Comments:

Generator Category Determination

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

CITATIONS	WDS	Generator Category Determination			
		C	NC	NI	NA
		Part 111 and 40 CFR 262.13			
R303(1) See R303(2)-(8) for quantity determinations	262A	The small quantity generator (SQG) determined its category based on the amount of hazardous waste generated each month <ul style="list-style-type: none"> • ≤ 1 kg (2.2 pounds) of Acute/Severely Toxic Hazardous Waste • >100 kg (220 pounds/25 gallons) and < 1,000 kg (2200 pounds/220 gallons) of Hazardous Waste • ≤100 kg (220 pounds) of Residues from Cleanup of Acute/Severely Toxic Hazardous Waste 			

Site Identification Number

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

CITATIONS	WDS	Site Identification Numbers			
		C	NC	NI	NA
		Part 111 & 40 CFR 262.18			
R308(1)	262A	The SQG has obtained a site identification number			

Manifest Requirements

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

CITATIONS	WDS	Manifest Requirements			
		C	NC	NI	NA
		Part 111 & 40 CFR 262 Subpart B			
R309(1)(a)&(b)	262B	Generator is using an approved manifest, and the manifest is completed as required			
R309(1)(c)	262B	Generator is utilizing e-manifesting instead of a paper manifest, as required under 40 CFR 3.10 and 262.24			
R309(1)(d)	262B	The generator uses a transporter that is registered and permitted under Act 138			

CITATIONS	WDS	Manifest Requirements Part 111 & 40 CFR 262 Subpart B	C	NC	NI	NA
R311(3)	262D	Generator has a copy of each manifest signed for 3 years, or until the generator receives a signed copy from the designated facility that received the waste.				
R312(5)	262D	For manifests not received from the designated facility within 60 days, the SQG has submitted legible copy of the manifests with description of the issue to the director.				
40 CFR 262.20(a)(1)	262D	Generator has registered with the EPA's e-Manifest system to obtain signed and dated copies of completed manifests.				
40 CFR 262.20(a)(2)	262D	Manifest corrections requested by the Director were addressed by the generator within 30 days from the date of the request. Data correction submissions must be made electronically via the post-receipt data corrections process as described in 40 CFR 265.71(l), which applies to corrections made to either paper or electronic manifests.				

List EPA ID and TSDFs used:

EPA ID	TSDFs Used

EPA ID and Transporters used:

EPA ID	Transporters Used

Note: Treatment, Storage, Disposal Facilities (TSDFs) are no longer required to send paper copies of manifests to the generator via mail.

Note: If a generator transports their own hazardous waste, the generator must be registered and permitted under act 138 and part 4 of these rules.

Note: The electronic signature methods for the e-manifest system must be methods that are designed and implemented in a manner that the Environmental Protection Agency (EPA) considers to be

as cost effective and practical as possible for the user of the manifest. An electronic signature must be a legally valid and enforceable signature under applicable EPA and other federal requirements pertaining to electronic signatures. Part 111, Rule 309(2)

Note: SQGs' are exempt from manifesting requirements if the waste is reclaimed under a contractual agreement that specifies the type of waste and to deliver the regenerated material back to the generator, i.e., tolling agreement. Part 111, Rule 309(3)

Note: Generators are exempt from manifesting requirements when transporting hazardous waste shipments on a public or private right-of-way within, or along, the border of contiguous property under the control of the generator, even if the property is contiguous property divided by a public or private right-of-way.

Note SQG that authorizes a transporter to commingle the generator's hazardous waste under R 299.9405(2) or (3) shall do either of the following (Part 111, Rule 309(4)):

- (a) Place in the special handling instructions and additional information section of the manifest the hazardous waste number followed by the letters "CS," as specified in R 299.9405(2), or the letters "CD," as specified in R 299.9405(3), and the associated manifest line item.
- (b) Place in the special handling instructions and additional information section of the manifest the words "Commingle Same," as specified in R 299.9405(2), or the words "Commingle Different," as specified in R 299.9405(3), and the associated manifest line item.

Note: Effective January 22, 2025, EPA's third manifest rule requires SQGs to create an account in the RCRAInfo Portal to access their signed hazardous waste manifests electronically instead of receiving them by mail and includes additional provisions for manifest data error corrections and exception, discrepancy, and unmanifested waste report integration into e-manifest. The third manifest rule has not yet been adopted into Part 111; however, revisions became effective in all 50 states on January 22, 2025. Once adopted into Part 111, the requirements will be enforceable in Michigan.

Note: The Generator Exception Report must include both of the following:

- A legible copy of the manifest for which the generator does not have confirmation of delivery.
- A cover letter signed by the generator, or the generator's authorized representative, explaining the efforts taken to locate the hazardous waste and the results of those efforts. In lieu of a letter to the director the generator must submit the Non-Receipt of Hazardous Waste Form.

Waste Minimization Certification

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

CITATIONS	WDS	Waste Minimization Certification				
		C	NC	NI	NA	
		40 CFR 262.27				
40 CFR 262.27(b)	262B	Generator has certified the waste minimization statement in Item 15 of the uniform hazardous waste manifest.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note: "I am an SQG. I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."

Comments:

Land Disposal Restrictions and Waste Minimization Certification

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

CITATIONS	WDS	Land Disposal Restrictions (LDR)	C	NC	NI	NA
		40 CFR 268.7				
40 CFR 268.7(a)(1)	268A	The generator determined that waste is restricted from land disposal prior to treatment.				
40 CFR 268.7(a)(2)	268A	If the waste exceeds treatment standards in § 268.40, 268.45, or § 268.49 or prohibitions, a notice went with the initial shipment including the following: <input type="checkbox"/> Applicable waste codes and manifest number of the initial shipment AND <input type="checkbox"/> Applicable wastewater/non wastewater category AND <input type="checkbox"/> This waste is subject to the LDRs. The constituents of concern for F001-F005, and F039, and underlying hazardous constituents in characteristic wastes AND <input type="checkbox"/> Waste determination data AND <input type="checkbox"/> Certification statement <input type="checkbox"/> Signature of an authorized representative				
40 CFR 268.7(a)(3)	268A	If the restricted waste meets the treatment standard in § 268.40, 268.45, or § 268.49 at the original point of generation, a notice went with the shipment including the following: <input type="checkbox"/> Applicable waste codes and manifest number of the initial shipment AND <input type="checkbox"/> Applicable wastewater/non wastewater category AND <input type="checkbox"/> This waste is subject to the LDRs. The constituents of concern for F001-F005, and F039, and underlying hazardous constituents in characteristic wastes AND <input type="checkbox"/> Waste determination data AND <input type="checkbox"/> Certification statement <input type="checkbox"/> Signature of an authorized representative				
40 CFR 268.7(a)(3)	268A	If the waste changes, the generator sends a new notice and certification to the receiving facility, and places copy in files.				

CITATIONS	WDS	Land Disposal Restrictions (LDR) 40 CFR 268.7	C	NC	NI	NA
40 CFR 268.7(a)(5)	268A	If the facility treats waste in Tanks or Containers in order to meet applicable treatment standards under 268.40, the facility has developed and follows a Waste Analysis Plan (WAP)				
40 CFR 268.7(a)(5)(ii)	268A	The WAP is kept in the facility's files and available to inspectors.				
40 CFR 268.7(a)(6)	268A	If the generator determined that the waste or contaminated soil is restricted based solely on his knowledge of the waste or waste generation process, all supporting data used to make this determination is retained on-site in the generator's files.				
40 CFR 268.7 (a)(7)	268A	If the facility that treats hazardous wastewater under NPDES permit or IPP, a one-time notice of 268.7(a)(7) describing those practices is maintained in the facility's files.				
40 CFR 268.7(a)(8)	268A	Generator maintains a copy of all notices, certifications, waste analysis data, and other documents related to LDR process for at least 3 years from the date that the waste was sent to TSDF				

Note: LDR requirements attach to a HW at the point of generation.

Note: If a generator is treating their HW to meet the LDR requirements, they must develop and follow a WAP. The WAP must include all information necessary to treat the HW and must be kept onsite.

Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.

Comments:

Recordkeeping/Reporting

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

CITATIONS	WDS	Recordkeeping/Reporting	C	NC	NI	NA
		Part 111 and 40 CFR 262 Subpart D				
R308(5)	262A	SQG re-notified the year in which re-notifications are required, and every 4 years afterwards, by September 1. Date facility re-notified: _____				
R311(1)	262D	The generator-maintained records supporting HW determination for not less than 3 years from the date the waste was last sent to on-site or off-site TSDF.				
R311(1)(a-e) and (i-ii)	262D	<p>The HW determination records include ALL the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Type of waste and the source or process from which it was produced (a) AND <input type="checkbox"/> Chemical composition and properties of the waste and the anticipated fluctuations in its chemical composition and properties (b) AND <input type="checkbox"/> Results of any tests, sampling, waste analyses, or other determinations made under R 299.9302 (c) AND <input type="checkbox"/> Records documenting the validity and relevance of the tests, sampling, and analytical methods used. (d) Including <ul style="list-style-type: none"> <input type="checkbox"/> The sampling procedure and the reasons for determining that the sample is representative of the waste (i) AND <input type="checkbox"/> The accuracy and precision of any tests conducted (ii) <input type="checkbox"/> The knowledge basis for the generator’s determination if testing, sampling, and waste analyses not conducted. (e) 				
R311(3)	262D	Generator has a copy of each manifest signed for 3 years, or until the generator receives a signed copy from the designated facility that received the waste				
R311(7)	262D	The generators keep documentation of all records required under R 299.9306 for not less than 3 years and make the records readily available to the department on request.				

Note: Every four years (September 1, 2025, September 1, 2029, September 1, 2033, etc.), an SQG can re-notify any time before September 1 of the reporting year to meet the re-notification requirement.

Note: The periods of retention referred to in this rule are extended automatically during any unresolved enforcement action regarding the regulated activity, or as requested by the EGLE director; Rule 311(8)

Comments:

Section 2: Satellite Accumulation

Satellite and Process Area	Hazardous waste number/Chemical Name	Size of Container

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

CITATIONS	WDS	Satellite Accumulation			
		C	NC	NI	NA
		Part 111 Rule 305 and 40 CFR 262.15			
R305(1)	262C	Accumulation in containers meets ALL the following conditions: <input type="checkbox"/> At or near the point of generation <input type="checkbox"/> Under the control of the operator of the process that generates the waste <input type="checkbox"/> Total no more than 55 gallons or 1 quart acutely/severely toxic			
R305(1)(a)	262C	Containers are in good condition			
R305(1)(b) and (c)(i)-(iii)	262C	Containers are compatible with the waste stored in them unless the requirements of 40 CFR 265.17(b) are met			
R305(1)(d)	262C	Containers holding hazardous waste are closed except for adding, removing, or consolidating or if temporary venting is necessary for the proper operating of equipment or to prevent dangerous situations, such as build-up of extreme pressure.			

CITATIONS	WDS	Satellite Accumulation				
		C	NC	NI	NA	
		Part 111 Rule 305 and 40 CFR 262.15				
R305(1)(e)(i-ii)	262C	Generator labeled the container with <input type="checkbox"/> The words “Hazardous Waste” (i) <input type="checkbox"/> An indication of the hazards of the contents (ii)				
R305(2)(b)(i-iii)	262C	When the SAA exceeds 55 gallons or non-acute HW or 1 quart of acutely/severely toxic HW, generator removes excess waste from SAA within 3 calendar days to one or more of the following: <input type="checkbox"/> Moved the hazardous waste to a central accumulation area, as required in R 306(1) (b-r) (i) OR <input type="checkbox"/> Removed the hazardous waste to an onsite interim status or licensed TSD (ii) OR <input type="checkbox"/> Removed the hazardous waste to an off-site designated facility (iii)				
R305(2)(c)	262C	Within 3 calendar days, the generator marked the container with date the excess amount began accumulating				
R305(3)	262C	SAA's have met the Conditions for SQG Accumulation of Waste, see Section 3 R 306 (1)(f) to (r)				

Note: If a container holding HW is not in good condition, or if it begins to leak, the generator **shall** immediately transfer the HW from this container to a container that is in good condition and does not leak, or immediately transfer and manage the waste in a central accumulation area operated in compliance with R 299.9306(1)(b) to (r) or R 299.9307(1). Part 111, Rule 305(1)(a)

Note: The indication of the hazards of the contents may include the applicable HW characteristic(s), the hazard communication consistent with 49 C.F.R. part 172, subpart E or subpart F, a hazard statement or pictogram consistent with 29 C.F.R. §1910.1200, or a chemical hazard label consistent with the NFPA standard number 704.

Comments:

Section 3: Accumulation Requirements

Accumulation Area Locations	Comments

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

CITATIONS	WDS	Accumulation Requirements	C	NC	NI	NA
		Part 111 Rule 306 and 40 CFR 262.16				
R306(1)(b)	262C	<p>SQG accumulates HW onsite for no more than 180 days unless the generator</p> <ul style="list-style-type: none"> <input type="checkbox"/> Is transporting waste 200 miles or more for offsite treatment, storage, or disposal may accumulate hazardous waste onsite for 270 days or less <input type="checkbox"/> Accumulates waste for more than 180 days or 270 days due to unforeseen, temporary, and uncontrollable circumstances, if granted a 30-day extension by the director or designee. <input type="checkbox"/> Receives a shipment back as a rejected load or residue in accordance with the manifest discrepancy provisions of R 299.9608 may accumulate the returned waste onsite in accordance with subrule (1) to (3) <input type="checkbox"/> Experiencing an episodic event may accumulate hazardous waste in accordance with R 299.9316 instead of LQG requirements (R 299.9307) 				
R306(1)(c)	262C	The quantity of hazardous waste accumulated onsite never exceeds 6,000 kg (unless waste is managed under an approved episodic event as outlined in Part 111 R316(3))				

CITATIONS	WDS	Accumulation Requirements Part 111 Rule 306 and 40 CFR 262.16	C	NC	NI	NA
R306(1)(d)(i) and CFR 264.175(a), (b), (c), and (d)	262C	Container accumulations of free liquids and/or F020, F021, F022, F023, F026, F027 greater than 1000 kg and less than 6000 kg must meet the following secondary containment requirements: <ul style="list-style-type: none"> <input type="checkbox"/> The base must have no cracks or gaps AND is impervious to contain leaks, spills, and precipitation (b)(1) <input type="checkbox"/> The base is sloped, drained to separate containment, or containers are elevated to prevent contact with accumulated liquids (b)(2) <input type="checkbox"/> Containment capacity of 10% of the total of all containers or 100% of the largest container, whichever is greater (only free liquid containers are counted) (b)(3) <input type="checkbox"/> Run-on is prevented unless the containment system has sufficient excess capacity (b)(4) <input type="checkbox"/> Spilled or leaked waste and accumulated precipitation is removed from the system in a timely manner and prevents overflow (b)(5) OR <ul style="list-style-type: none"> <input type="checkbox"/> Containment systems that do not accumulate free liquids or F wastes listed above must be sloped, drained to separate containment, or containers are elevated to prevent contact with accumulated liquids (c)(1) 				
R306(1)(d)(i) (A)	262C	Containers are in good condition and do not leak				
R306(1)(d)(i) (B)	262C	Containers made of, or lined with, material that will not react with, and are compatible with, the HW				
R306(1)(d)(i) (C)	262C	Containers holding HW must be closed at all times during accumulation, except when it is necessary to add or remove waste				

CITATIONS	WDS	Accumulation Requirements				
		C	NC	NI	NA	
		Part 111 Rule 306 and 40 CFR 262.16				
R306(1)(d)(i) (D)	262C	Containers holding HW must not be opened, handled, or accumulated in a manner that may rupture the container or cause it to leak				
R306(1)(d)(i) (E)	262C	Not less than weekly, central accumulation areas are inspected for leaking containers and for deterioration of containers caused by corrosion or other factors				
R306(1)(d)(i) (F)(I)	262C	Incompatible wastes, or incompatible wastes and materials, are not placed in the same container unless the requirements of 40 CFR 265.17(b) are met.				
R306(1)(d)(i) (F)(II)	262C	HW not placed in an unwashed container that previously held an incompatible waste or material unless the requirements of 40 CFR 265.17(b) are met.				
R306(1)(d)(i) (F)(III)	262C	A container accumulating HW that is incompatible with any waste or other materials accumulated or stored nearby is separated from the other materials or protected from them by means of a dike, berm, wall, or other device.				
R306(1)(d)(i) (G)(I-III)	262C	Mark or label each container with all the following: <input type="checkbox"/> The words "Hazardous Waste" (I) <input type="checkbox"/> Indication of the hazards of the contents (II) <input type="checkbox"/> The date upon when each period of accumulation begins clearly visible for inspection on each container (III)				
R306(1)(f)	262C	The SQG operates the site in a way that minimizes the possibility of a fire, explosion, or release of hazardous waste to air, soil, or surface water that could threaten human health or the environment				

CITATIONS	WDS	Accumulation Requirements				
		C	NC	NI	NA	
		Part 111 Rule 306 and 40 CFR 262.16				
R306(1)(g) (i)-(iv)	262C	All areas where hazardous waste is either generated or accumulated must be equipped with all the items specified. <input type="checkbox"/> An internal communications or alarm system (i) <input type="checkbox"/> A device, such as a telephone, immediately available at the scene of operations, or a hand-held, two-way radio (ii) <input type="checkbox"/> Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment (iii) <input type="checkbox"/> Water at adequate volume, or foam producing equipment, or automatic sprinklers, or water spray systems (iv)				
R306(1)(h)	262C	All communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, is tested and maintained to ensure proper operation in time of emergency				
R306(1)(i)	262C	When HW is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation shall have immediate, unimpeded access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee				
R306(1)(j)	262C	If there is just 1 employee on the premises while the SQG is operating, the employee shall have immediate unimpeded access to a device capable of summoning external emergency assistance				
R306(1)(k)	262C	SQG maintains aisle space for unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of site operation				

CITATIONS	WDS	Accumulation Requirements				
		C	NC	NI	NA	
		Part 111 Rule 306 and 40 CFR 262.16				
R306(1)(l)	262C	SQG attempted to make arrangements with local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers and local hospitals, taking into account the types and quantities of hazardous wastes handled at the generator's site and maintains records documenting the arrangement or attempt				
R306(1)(m)	262C	There is not less than 1 employee either on the premises or on call with the responsibility for coordinating all emergency response measures specified in R306(1)(p).				
R306(1)(n)	262C	SQG must post next to telephones, or in areas directly involved in the generation and accumulation of hazardous waste, the following: <input type="checkbox"/> Name & phone number of the emergency coordinator <input type="checkbox"/> Location of fire extinguishers and spill control material, and, if present, fire alarm <input type="checkbox"/> Phone number of the fire department, unless the site has a direct alarm				
R306(1)(o)	262C	Employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities				
R306(1)(p)	262C	In an emergency event, the emergency coordinator responded appropriately (see note).				
R306(1)(q)	262C	SQG ensures that the area where the waste is accumulated is protected from weather, fire, physical damage, and vandals				
R306(1)(r)	262C	HW accumulated so HW or HW constituents cannot escape by gravity into the soil, directly or indirectly, into surface or groundwaters, or into drains or sewers and so that fugitive emissions are not in violation of Part 55 of the act				
R306(1)(d)(ii)	262C	Note: If SQG waste accumulated in tanks, complete the SQG Tank Inspection Form (EQP 5162).				

CITATIONS	WDS	Accumulation Requirements			
		C	NC	NI	NA
		Part 111 Rule 306 and 40 CFR 262.16			
R306(1)(d)(iii)	262C	Note: If SQG waste placed on a drip pad, complete Wood Preserving Inspection Form (EQP 5172).			

Note: The indication of the hazards of the contents may include the applicable hazardous waste characteristic(s), the hazard communication consistent with 49 C.F.R. part 172, subpart E or subpart F, a hazard statement or pictogram consistent with 29 C.F.R. §1910.1200, or a chemical hazard label consistent with the NFPA standard number 704.

Note: Arrangements may be made with the local emergency planning committee if it is determined to be the appropriate organization with which to make arrangements.

Note: As part of coordination with local emergency authorities, the small quantity generator shall attempt to familiarize these organizations with the layout of the small quantity generator’s site, the properties of hazardous waste handled at the small quantity generator’s site and associated hazards, places where personnel would normally be working, entrances to roads inside the small quantity generator’s site, and possible evacuation routes as well as the types of injuries or illnesses that could result from fires, explosions, or releases at the small quantity generator’s site. If more than 1 police or fire department might respond to an emergency, the small quantity generator shall attempt to make arrangements designating primary emergency authority to a specific fire or police department, and arrangements with any others to provide support to the primary emergency authority.

Note: The emergency coordinator or designee shall respond to any emergencies that arise. The applicable responses are as follows:

- In the event of a fire, call the fire department or attempt to extinguish the fire using a fire extinguisher.
- In the event of a spill, contain the flow of HW to the extent possible, and clean up the HW and any contaminated materials or soil.
- In the event of a fire, explosion, or other release of HW or hazardous waste constituents that could threaten human health or the environment or if the SQG has knowledge that a spill has reached surface water or groundwater, the SQG shall immediately notify the department’s pollution emergency alerting system. For releases that could threaten human health outside the SQG’s site or if the small quantity generator has knowledge that a spill

has reached surface water, the small quantity generator shall immediately notify the national response center.

Note: If the employee is the emergency coordinator and, if on call, should be available to respond to an emergency by reaching the generator's site within a short period of time.

Comments:

Section 4: Episodic Generation

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

CITATION(S)	WDS	Episodic Generation				
		C	NC	NI	NA	
		Part 111 and 40 CFR 262.232				
R316(3)(b)	262C	Generator notified the director no later than 30 calendar days prior to initiating a planned episodic event using EQP5150.				
R316(3)(b)	262C	Generator notified the director via phone, email, or fax within 72 hours of an unplanned episodic event using EQP5150.				
R316(3)(b)	262C	Generator included all the following info in the notification: <input type="checkbox"/> The start date and end date of the episodic event <input type="checkbox"/> The reason(s) for the event <input type="checkbox"/> The types and estimated quantities of hazardous waste expected to be generated as a result of the event <input type="checkbox"/> SQG contact and emergency coordinator with 24-hour telephone access to discuss the notification submittal or respond to an emergency				
R316(3)(d)	262C	SQG did not accumulate HW generated from an episodic event on drip pads or in containment buildings.				
R316(3)(e)(i) (A)	262C	If HW stored in containers, complies with requirements of R299.306(1)(d)(i) (SQG container requirements)				
R316(3)(e)(i) (B)(I)-(III)	262C	Generator labeled/marked containers with the following: <input type="checkbox"/> The words “Episodic Hazardous Waste” (I) <input type="checkbox"/> A description of the waste and an indication of the hazards of the contents (II) <input type="checkbox"/> The date upon which the episodic event began (III)				
R316(3)(e)(ii) (A)	262C	If stored in tanks, complies with the requirements of R299.306(1)(d)(ii) (SQG tank requirements)				

CITATION(S)	WDS	Episodic Generation Part 111 and 40 CFR 262.232	C	NC	NI	NA
R316(3)(e)(ii) (B)(I)-(II); (C); and (D)	262C	If HW accumulated in tanks, generator complied with the following: Each tank marked with: <ul style="list-style-type: none"> <input type="checkbox"/> The words “Episodic Hazardous Waste” (B)(I) <input type="checkbox"/> A description of the waste and an indication of the hazards of the contents (B)(II) <input type="checkbox"/> Used inventory logs, monitoring equipment, or other records to identify the date each event begins (C) <input type="checkbox"/> Inventory logs or records with the above information onsite and readily available for inspection (D) 				
R316(2)(e)(iii)	262C	Generator ensured that hazardous waste was managed in a manner that minimizes the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents to the air, soil, or water, which could threaten human health or the environment				
R 316(3)(f)	262C	Generator complied with the HW manifest requirements when it sent episodic event HW offsite to a designated facility within 60 days from the start of the episodic event				
R 316(3)(g) (i)-(vi)	262C	Generator maintains all the following records for 3 years from the end date of the episodic event: <ul style="list-style-type: none"> <input type="checkbox"/> The beginning and end dates of the episodic event (i) <input type="checkbox"/> A description of the episodic event (ii) <input type="checkbox"/> A description of the types and quantities of HW generated during the event (iii) <input type="checkbox"/> A description of how the HW was managed, as well as the name of the designated facility that received the hazardous waste (iv) <input type="checkbox"/> The name of HW transporters (v) <input type="checkbox"/> Approval letter from the director if the generator petitioned to conduct one additional episodic event per calendar year (vi) 				

Note: SQGs are limited to one episodic event per calendar year; however, the generator may petition the department for a second episodic event. The second episodic event cannot be the same as the first episodic event (if the first event was planned, the second must be unplanned and vice versa).

Note: Hazardous waste managed as part of an episodic event does not have to be counted toward a generator's category (40 CFR 262.13(c)(8)).

Note: Treatment is not allowed by SQGs (except in onsite elementary unit).

Note: The generator has up to 60-calendar days from the start of the episodic event to manifest and send its hazardous waste generated from the episodic event to a designated facility. If the 60-calendar days is exceeded, that waste counts towards the generator's category and must be managed under the regulations for that generator category

Comments: