



Minnesota Very Small Quantity Generator Checklist

Environmental Audits/General #1.32, January 2000

The self audit checklists are designed to assist businesses by providing a low cost way of reviewing compliance with Minnesota's environmental laws and rules. Because the laws and rules are numerous and often complicated, this checklist cannot be a complete guide to your legal obligation. You may have obligations that are not covered on this checklist. If you have questions regarding this checklist, your obligations, or conditions you discover when you evaluate your business operations, please call the MPCA Hazardous Waste Hotline at (651) 297-8681.

I. GENERAL INSPECTION INFORMATION

Site Name:	EPA ID Number:
Address:	Waste Activity:
City:	Zip/9 Digit:
County:	District:
	Waste generated per month
Current Number of Employees:	Years in Business or Date Company Started:
Date of last MPCA Hazardous Waste Inspection: _____	
Inspection Date:	Time: From _____ to _____

LEAD INSPECTOR:	Phone #
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Other people present: (name, title, organization)	Phone #

Company Products or Services:

II. LICENSING/IDENTIFICATION/PERMITS

IDENTIFICATION - WASTE TABLE		
Waste Name/Code	Quantity Generated in (last year)	Changes

**G8: Licensing / EPA / Permits**

Rule	Requirement	Compliance Status	Remarks
7045.0221	Has generator obtained a generator identification number?		
7045.1020 A	Metro Area – Does the generator have an approved license?		
7045.0225 1	Outstate – Does the site have a current hazardous waste generator license?		
7045.0230 1, B	Outstate – Did the company include all hazardous waste streams on its license application?		
7045.0225 2	Is the generator's license displayed in a public area at the licensed site?		
7001.0520 1, A	Does the generator operate as a TSD without a permit?		

G8: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0208 1, B	Is hazardous waste disposed of at a permitted TSD? (VSQGs can also deliver to a VSQG collection program site)		
7045.0294 5	Are the required records (training, analytical results, inspection reports, license renewal app, exception reports, manifests) located at the licensed site and available for inspection?		
7045.0626 5	Are weekly inspections of hazardous waste containers and their storage areas conducted AND documented?		Referenced by: 7045.0292, Subp.6,B [Very Small Quantity Generator]
7045.0208 1, E	Does the company comply with the POTW requirements for sewerage hazardous waste?		
7045.0655 3, A	If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, does the owner or operator conduct timely inspections of the unit(s) for malfunction deterioration, operator error and discharges?		

**G8: General Management for Generators**

Rule	Requirement	Compliance Status	Remarks
7045.0655 3, B	If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, does the company follow a written inspection schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment?		
7045.0655 3, E	If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site?		

G8: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0261 1	Are shipments of hazardous waste made without using a manifest? (exceptions for VSQGs)		
7045.0261 7	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)		
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?		
7045.0265 1, D	Are two-signature (generator) copies of manifests set to MPCA within 5 days of shipment date?		
7045.0265 4, A	Does the generator ensure that out-of-state facility copies get to MPCA within 40 days of acceptance by the facility?		
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?		
7045.0302 1	If company exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc.)		

**G8: Preparedness & Prevention**

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?		Referenced by: 7045.0292, Subp.6,G [Very Small Quantity Generator]
7045.0566 3, A	Is a suitable alarm or communication system in place to provide emergency instructions to company personnel?		Referenced by: 7045.0292, Subp.6,G [Very Small Quantity Generator]
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders?		Referenced by: 7045.0292, Subp.6,G [Very Small Quantity Generator]
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?		Referenced by: 7045.0292, Subp.6,G [Very Small Quantity Generator]
7045.0566 3, D	Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment)?		Referenced by: 7045.0292, Subp.6,G [Very Small Quantity Generator]
7045.0566 4	Is emergency equipment tested and maintained?		Referenced by: 7045.0292, Subp.6,G [Very Small Quantity Generator]
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc.)?		Referenced by: 7045.0292, Subp.6,G [Very Small Quantity Generator]
7045.0275 2	If the company had a release to the environment, did the company immediately notify the agency?		
7045.0275 3	If the company has had a release, did the company recover as rapidly and as thoroughly as possible, any hazardous waste that has leaked, or otherwise escaped a container?		

G8: Waste Evaluation

Rule	Requirement	Compliance Status	Remarks
7045.0214 1	Have wastes been evaluated within 60 days of the date they were initially generated?		
7045.0294 3	Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)?		

**G8: Pre-Transport**

Rule	Requirement	Compliance Status	Remarks
7045.0270 1	Prior to shipment, are hazardous waste containers marked according to US DOT hazardous materials regulations, including: the words "HAZARDOUS WASTE Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.", the name and address of the generator, and the manifest number?		
7045.0270 4	Prior to shipment, are wastes packaged according to US DOT hazardous materials regulations?		
7045.0270 5	Prior to transport, have the applicable warning labels been placed on each package in accordance with US DOT regulations?		

G8: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0292 6, C	Are hazardous waste containers labeled with accumulation start date? OR Is start date recorded in a clear and legible log for non-shipping containers (or tanks)?		
7045.0292 6, F	Are hazardous waste containers and tanks properly labeled with the words "Hazardous Waste" and a description that clearly identifies their contents to employees and emergency personnel?		
7045.0292 6, D	Are hazardous waste storage areas protected from unauthorized access and inadvertent damage from vehicles and equipment?		
7045.0292 6, E	Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? If outdoors, is the surface curbed?		
7045.0292 6, H	If more than 1000 kg of hazardous waste accumulated, does generator meet the timeliness and other requirements of a Small Quantity Generator?		
7045.0626 2, A	Are hazardous waste storage containers in good condition and leakproof?		Referenced by: 7045.0292, Subp.6,B [Very Small Quantity Generator]

**G8: Storage Requirements**

Rule	Requirement	Compliance Status	Remarks
7045.0626 2, B	Are there suitable leakproof covers for the hazardous waste containers?		Referenced by: 7045.0292, Subp.6,B [Very Small Quantity Generator]
7045.0626 4	Are hazardous waste storage containers closed? Are waste containers which can be degraded when exposed to moisture or sunlight covered by an overhead roof or other suitable covering that does not hide the labels?		Referenced by: 7045.0292, Subp.6,B [Very Small Quantity Generator]
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?		Referenced by: 7045.0292, Subp.6,B [Very Small Quantity Generator]
7045.0626 6	Are incompatible wastes adequately separated?		Referenced by: 7045.0292, Subp.6,B [Very Small Quantity Generator]
7045.0685 2, A	Are spent lead-acid batteries that are stored indoors on an impermeable curbed surface AND are provisions made to recontainerize leaking batteries, AND are there regular inspections to assure the integrity of the batteries?		
7045.0685 2, B,1	Are spend lead-acid batteries that are stored indoors on an impermeable curbed surface AND are provisions made to recontainerize leaking batteries, AND are there regular inspections to assure the integrity of the batteries AND is the containment area covered to prevent precipitation run on?		
7060.0600 2	Has the company discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewerage or other means?		
7045.0855 2, C	If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)?		
7045.0292 8, B,2	Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents?		

**G8: Storage Requirements**

Rule	Requirement	Compliance Status	Remarks
7045.0292 8, C,2	For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept?		
7045.0292 8, D,1	For satellite accumulation containers, is fill date marked on the containers?		
7045.0292 8, D,2	For satellite accumulation containers, are they moved within 3 days of fill date to storage area?		