



Minnesota Small Quantity Generator Checklist

Environmental Audits/General #1.33, 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



G4: 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?		
G1: 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.5,B [Small Quantity Generator]
7045.0568 1	Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders)		Referenced by: 7045.0292, Subp.5,G [Small Quantity Generator]
7045.0568 3	If the company was unable to make arrangements with local authorities, have they documented the attempts?		Referenced by: 7045.0292, Subp.5,G [Small Quantity Generator]



G1: General Management for Generators			
Rule	Requirement	Compliance Status	Remarks
7045.0292 5, H,2	Does the generator have posted at the telephone, the name and phone number of emergency coordinator, the location of fire extinguishers and spill control material, the location of the fire alarm and the telephone number of the fire department.		
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.		
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?		
G1: Manifests			
Rule	Requirement	Compliance Status	Remarks
7045.0261	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)		

**G1: Manifests**

Rule	Requirement	Compliance Status	Remarks
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.)		

G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0292 5, H,3	Are employees thoroughly familiar with waste handling and emergency procedures relevant to their job? (within 6 mo. of assignment to job). Has employer documented that employee orientation or training of this has been done?		
7045.0292 5, H,1	Is a trained and responsible Emergency Coordinator on-site or on-call?		

**G4: Preparedness & Prevention**

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?		Referenced by: 7045.0292, Subp.5,G [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.5,G [Small Quantity Generator]
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders?		Referenced by: 7045.0292, Subp.5,G [Small Quantity Generator]
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?		Referenced by: 7045.0292, Subp.5,G [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.5,G [Small Quantity Generator]
7045.0566 4	Is emergency equipment tested and maintained?		Referenced by: 7045.0292, Subp.5,G [Small Quantity Generator]
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc.)?		Referenced by: 7045.0292, Subp.5,G [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?		

G4: 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)?		



G1: Land Disposal Restrictions			
Rule	Requirement	Compliance Status	Remarks
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the company sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the generators site? Have new notifications been sent when there are changes in wastestreams and to any new receiving facilities?		
268.7 (a), (4) “Generator Paperwork Requirement Table” column 268.7,(a),(2), item 1 3	For waste or contaminated soil that does not meet the treatment standards, do land disposal restriction notifications contain the following: a. All applicable waste codes and Manifest numbers?		Referenced by: 40 CFR 268.7,(a),(2) [LAND DISPOSAL RESTRICTIONS]
268.7 (a), (4) “Generator Paperwork Requirement Table” column 268.7,(a),(2), item 4 1	b. Treatability group (non-wastewater or wastewater) and subcategory (when applicable)		Referenced by: 40 CFR 268.7,(a),(2) [LAND DISPOSAL RESTRICTIONS]
268.7 (a), (4) “Generator Paperwork Requirement Table” column 268.7,(a),(2), item 3	c. Constituents of concern for F001-F005, F039, and hazardous underlying constituents in characteristic waste (not managed in a CWA or CWA-equivalent facility)? Note: This requirement does not apply if the waste will be treated and monitored for ALL constituents.		Referenced by: 40 CFR 268.7,(a),(2) [LAND DISPOSAL RESTRICTIONS]



G1: Land Disposal Restrictions			
Rule	Requirement	Compliance Status	Remarks
268.7 (a), (4) “Generator Paperwork Requirement Table” column 268.7,(a),(2), item 7	d. For hazardous debris being treated with alternative treatment standards: the names of the contaminants subject to treatment, and an indication that these contaminants are being treated to comply with 268.45		Referenced by: 40 CFR 268.7,(a),(2) [LAND DISPOSAL RESTRICTIONS]
268.7 (a), (4) “Generator Paperwork Requirement Table” column 268.7,(a),(2), item 8	e. For contaminated soil of which the company has applied alternative treatment standards has the company included the constituents subject to treatment, and the statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with the soil treatment standards as provided by 268.49 (c) of the universal treatment standard.		Referenced by: 40 CFR 268.7,(a),(2) [LAND DISPOSAL RESTRICTIONS]
268.7 (a), (3), (i)	For all hazardous waste that does meet treatment standards at the point of generation, has the company sent a one-time notification with signed certifications to the receiving TSD and kept a copy in its file?		If your business is located in one of the 7 metro counties, please contact your county environmental department to determine the notification requirements for your county.
268.7 (a), (4) “Generator Paperwork Requirement Table” column 268.7,(a),(3), item 1	For all waste that does meet treatment standards, do notifications contain the following: a. All applicable EPA waste codes and manifest number?		40 CFR 268.7,(3),(i) [LAND DISPOSAL RESTRICTIONS]
268.7 (a), (4) “Generator Paperwork Requirement Table” column 268.7,(a),(3), item 9	b. Certification statement		Referenced by: 40 CFR 268.7,(a),(3),(i) [LAND DISPOSAL RESTRICTIONS]



G1: Land Disposal Restrictions			
Rule	Requirement	Compliance Status	Remarks
268.7 (a), (4) “Generator Paperwork Requirement Table” column 268.7,(a),(4), item 1 4	For waste or contaminated soil that are subject to exemptions, does the notification contain: a. All applicable EPA waste codes; b. Manifest number?		Referenced by: 40 CFR 268.7,(a),(4) [LAND DISPOSAL RESTRICTIONS]
268.7 (a), (4) “Generator Paperwork Requirement Table” column 268.7,(a),(4), item 2 1	c. The date the waste was subject to the prohibitions?		Referenced by: 40 CFR 268.7,(a),(4) [LAND DISPOSAL RESTRICTIONS]
268.7 (a), (4) “Generator Paperwork Requirement Table” column 268.7,(a),(4), item 7	d. For debris being treated with alternative treatment standards, the contaminants subject to treatment, and an indication that these contaminants are being treated to comply with 268.45?		Referenced by: 40 CFR 268.7,(a),(4) [LAND DISPOSAL RESTRICTIONS]
7045.1305 A	Is dilution used as a substitute for adequate treatment?		
7045.1380 2	Does the company have justification for storage beyond one year?		
7045.1315 1, D	For companies that treat prohibited waste in tanks or containers to meet treatment standards, is a copy of the waste analysis plan for this treatment on-site, and available to inspectors?		
7045.1315 1, D, 1	For companies that treat prohibited waste in tanks or containers, is the waste analysis plan based on detailed chemical and physical analysis?		



G1: Land Disposal Restrictions			
Rule	Requirement	Compliance Status	Remarks
7045.1315 1, B,1,a	For waste treated in tanks or containers and then shipped off-site, do notifications and certifications contain: a. All applicable EPA waste codes?		Referenced by: 7045.1315,1,D,3 [Facility requirements.]
7045.1315 1, B,1,b	b. Treatability group (non-wastewater or wastewater) and subcategory (when applicable)		Referenced by: 7045.1315,1,D,3 [Facility requirements.]
7045.1315 1, B,1,c	c. Manifest number?		Referenced by: 7045.1315,1,D,3 [Facility requirements.]
268.7 (a), (4) “Generator Paperwork Requirement Table” column 268.7,(a),(3) item 3	d. Constituents of concern for F001-F005, F039, and hazardous underlying constituents (not managed in a CWA or CWA-equivalent facility)? Note: This requirement does not apply if the waste will be treated and monitored for ALL constituents.		Referenced by: 40 CFR 268.7(a)(5)(iii) [LAND DISPOSAL RESTRICTIONS]
7045.1315 1, B,1,d	e. Waste analysis data (where available)		Referenced by: 7045.1315,1,D,3 [Facility requirements.]
7045.1315 1, E	For generators that use “knowledge” to evaluate wastes, does the generator retain on-site all supporting data for waste determinations?		
268.7 (a), (9), (i)	For companies that are using alternative treatment standards for lab packs of hazardous wastes, has the company submitted on-time notification that contains EPA waste codes, manifest number and a one-time certification signed by an authorized representative?		
268.7 (a), (9), (ii)	Due to changes with the lab pack wastes, or receiving facility, has the company submitted additional notification and certifications, and kept a copy on-site?		

**G1: 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?		

G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0292 5	Has the company accumulated more than 3000 KG (6600 lbs) of hazardous waste?		
7045.0292 5, A	Does company have hazardous waste that has accumulated for more than 180 days (270 days) of the container accumulation start date?		
7045.0292 5, C	Are hazardous waste containers and tanks labeled with their accumulation start date and is it visible for inspection? OR Is start date		
7045.0292 5, 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 5, E	Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? If outdoors, is the surface curbed?		
7045.0626 2, A	Are hazardous waste storage containers in good condition and leakproof?		Referenced by: 7045.0292, Subp.5,B [Small Quantity Generator]



G1: 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.5,B [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.5,B [Small Quantity Generator]
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?		Referenced by: 7045.0292, Subp.5,B [Small Quantity Generator]
7045.0626 6	Are incompatible wastes adequately separated?		Referenced by: 7045.0292, Subp.5,B [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?		



G1: 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?		