



Minnesota Large Quantity Generator Checklist

Environmental Audits/General #1.34, 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

**G1: 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.1,B [Large 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.1,G [Large 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.1,G [Large Quantity Generator]



G1: General Management for Generators			
Rule	Requirement	Compliance Status	Remarks
7045.0208 1, E	Does the company comply with the POTW requirements for sewered 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)		
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?		

**G1: Manifests**

Rule	Requirement	Compliance Status	Remarks
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
7045.0558 2	Does the company have a hazardous waste program director trained in hazardous waste management procedures?		Referenced by: 7045.0292, Subp. 1, G [Large Quantity Generator]
7045.0558 1	Have employees that manage hazardous waste completed a hazardous waste training programs?		Referenced by: 7045.0292, Subp. 1, G [Large Quantity Generator]
7045.0558 3	Does the training program include hazardous waste management and emergency response procedures relevant to the positions held by facility personnel?		Referenced by: 7045.0292, Subp. 1, G [Large Quantity Generator]
7045.0558 4	Are new employees trained in hazardous waste management within 6 months of hire or transfer?		Referenced by: 7045.0292, Subp. 1, G [Large Quantity Generator]
7045.0558 6, D	Has the company kept records that document that the initial training and annual review training has been given?		Referenced by: 7045.0292, Subp. 1, G [Large Quantity Generator]
7045.0558 5	Is refresher training regarding the management of hazardous waste provided at least once per calendar year?		Referenced by: 7045.0292, Subp. 1, G [Large Quantity Generator]
7045.0558 6, A	Does the company maintain training records which include a job title for each position at the facility related to hazardous waste?		Referenced by: 7045.0292, Subp. 1, G [Large Quantity Generator]
7045.0558 6, B	Do the records include a job description for each position related to hazardous waste?		Referenced by: 7045.0292, Subp. 1, G [Large Quantity Generator]
7045.0558 6, C	Is a written description of the type and amount of training (initial & continuing) documented for each position related to hazardous waste?		Referenced by: 7045.0292, Subp. 1, G [Large Quantity Generator]

**G1: Personnel Training**

Rule	Requirement	Compliance Status	Remarks
7045.0558 7	Have training records been maintained for lifetime of facility (or 3 years after an employee leaves)?		Referenced by: 7045.0292, Subp.1, G [Large Quantity Generator]

G1: Contingency Plan

Rule	Requirement	Compliance Status	Remarks
7045.0572 2	Does the company have a contingency plan?		Referenced by: 7045.0292, Subp 1, G [Large Quantity Generators]
7045.0574 1	Does the company have an Emergency Coordinator on-site or on-call, and does s/he have authority to act (commit resources)?		Referenced by: 7045.0292, Subp.1, G [Large Quantity Generator]
7045.0572 4, A	Does the contingency plan specify employees' emergency response actions?		Referenced by: 7045.0292, Subp.1, G [Large Quantity Generator]
7045.0572 4, C	Does the plan describe arrangements agreed to with local emergency responders.		Referenced by: 7045.0292, Subp.1, G [Large Quantity Generator]
7045.0572 4, D	Does the plan include up-to-date name, address and home and work phone numbers for emergency coordinators?		Referenced by: 7045.0292, Subp.1, G [Large Quantity Generator]
7045.0572 4, E	Does the contingency plan include an up-to-date emergency equipment list?		Referenced by: 7045.0292, Subp.1, G [Large Quantity Generator]
7045.0572 4, F	Is there an evacuation plan for employees that includes signals used to begin evacuation, and primary and alternate evacuation routes?		Referenced by: 7045.0292, Subp.1, G [Large Quantity Generator]
7045.0572 5, A	Is a copy of the contingency plan maintained on-site?		Referenced by: 7045.0292, Subp.1, G [Large Quantity Generator]
7045.0572 5, B	Have copies of the contingency plan been submitted to local authorities and emergency response teams?		Referenced by: 7045.0292, Subp.1, G [Large Quantity Generator]
7045.0572 6	Has the contingency plan been amended when necessary? (rule change, emergency equipment change, process change, emergency coordination change, plan failed)		Referenced by: 7045.0292, Subp.1, G [Large Quantity Generator]

**G1: Preparedness & Prevention**

Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?		Referenced by: 7045.0292, Subp.1,G [Large 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.1,G [Large Quantity Generator]
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders.		Referenced by: 7045.0292, Subp.1,G [Large Quantity Generator]
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?		Referenced by: 7045.0292, Subp.1,G [Large 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.1,G [Large Quantity Generator]
7045.0566 4	Is emergency equipment tested and maintained?		Referenced by: 7045.0292, Subp.1,G [Large Quantity Generator]
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc.)?		Referenced by: 7045.0292, Subp.1,G [Large 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, spilled, or otherwise escaped a container?		

G1: 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]
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]

**G1: Land Disposal Restrictions**

Rule	Requirement	Compliance Status	Remarks
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?		Referenced by: 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]
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),(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 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?		
268.7 (a), (8)	Does the company retain, on site, copies of initial notifications, certifications, and other relevant documents for a period of 3 years?		
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?		
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.]

**G1: Land Disposal Restrictions**

Rule	Requirement	Compliance Status	Remarks
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 1, A	Has the generator stored hazardous waste for more than 90 days beyond the waste accumulation start date?		
7045.0292 1, C	Are hazardous waste containers and tanks labeled with the waste accumulation start date and is it visible for inspection? OR is the accumulation start date recorded in a clear and legible log for non-shipping containers or tanks?		
7045.0292 1, 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 1, D	Are hazardous waste storage areas (outdoors) protected from unauthorized access and inadvertent damage from vehicles and equipment?		
7045.0292 1, 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.1,B [Large Quantity Generator]
7045.0626 2, B	Are there suitable leakproof covers for the hazardous waste containers?		Referenced by: 7045.0292, Subp.1,B [Large 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.1,B [Large Quantity Generator]
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?		Referenced by: 7045.0292, Subp.1,B [Large Quantity Generator]
7045.0626 6	Are incompatible wastes adequately separated?		Referenced by: 7045.0292, Subp.1,B [Large 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?		



G1: Storage Requirements			
Rule	Requirement	Compliance Status	Remarks
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?		
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?		