## HAZARDOUS WASTE GENERATOR
### COMPLIANCE INSPECTION REPORT

### GENERAL REQUIREMENTS (GGR)

<table>
<thead>
<tr>
<th>Requirement</th>
<th>YES</th>
<th>NO</th>
<th>NA</th>
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<tbody>
<tr>
<td>1. Has the generator evaluated each potentially hazardous waste to determine if it is hazardous? <strong>40 CFR 262.11</strong></td>
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<td>a. If waste was tested, was the analysis conducted by a laboratory certified by KDHE? <strong>KAR 28-31-262(c)(2)</strong></td>
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<td>b. If waste was not tested, did the generator use knowledge of the hazardous characteristics of the waste in light of the materials or processes used? <strong>40 CFR 262.11(c)(2)</strong></td>
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<td>c. Is documentation of the waste determination kept for three years from the date the waste was last sent to on-site or off-site treatment, storage or disposal? <strong>40 CFR 262.40(c)</strong></td>
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<td>2. If hazardous waste is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has the generator received written approval from the City - POTW?</td>
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<td>3. Has the facility obtained a Special Waste Disposal Authorization (SWDA) for each special waste? <strong>KAR 28-29-109(c)</strong></td>
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<td>4. If the generator treats or recycles hazardous waste on-site (such as in a still), do they count waste correctly? <strong>40 CFR 261.5(d)(2)</strong></td>
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<td>a. If the waste is not counted, is it exempt because of a closed-loop system?</td>
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<td>5. Has the KSQG, SQG, or LQG notified KDHE and obtained an EPA Identification Number? <strong>40 CFR 262.12(a)</strong> (Mark NA only for CESQG)</td>
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<td>6. Is current notification accurate? (Updates must be made within 60 days of the change) <strong>KAR 28-31-4</strong></td>
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### UNIVERSAL WASTE

<table>
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<tr>
<th>Requirement</th>
<th>YES</th>
<th>NO</th>
<th>NA</th>
</tr>
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<tbody>
<tr>
<td>7. Does the facility choose to manage some of its waste as universal waste? If no, skip this section. If yes, check each type of universal waste that applies: batteries</td>
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<tr>
<td>mercury-containing equipment</td>
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<td></td>
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<tr>
<td>pesticides</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>lamps</td>
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<tr>
<td>8. Is the facility a small quantity handler of universal waste (accumulates &lt;11,000 lbs or &lt;5,000 kgs)? If the facility is a large quantity handler of universal waste, explain under &quot;additional information&quot; and skip the remaining questions in this section. These questions are designed only for small quantity handlers of universal waste.</td>
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<td>9. If the facility manages mercury-containing equipment, do they remove mercury-containing ampules from equipment? If yes, are the requirements of <strong>40 CFR 273.13(c)(2)</strong> met? (These include using secondary containment during the removal, having a mercury spill kit available, training employees, and other requirements.) <strong>40 CFR 273.13(c)(2)</strong></td>
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</table>
10. Are all universal wastes managed in closed containers that are structurally sound, adequate to prevent breakage, compatible with the contents of the container, lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?
   a. Batteries (only damaged or leaking batteries must be contained) 40 CFR 273.13(a)(1) □ □ □
   b. Pesticides 40 CFR 273.13(b)(1) □ □ □
   c. Mercury-containing equipment 40 CFR 273.13(c)(1) □ □ □
   d. Lamps 40 CFR 273.13(d)(1) □ □ □

11. Is each container (or unit if not containerized) marked appropriately with one of the following phrases (substitute the appropriate universal waste for the blank)?:
   "Universal Waste-_______", or "Waste_______" or "Used_______"?
   a. Batteries (only damaged or leaking batteries must be contained) 40 CFR 273.14(a) □ □ □
   b. Pesticides 40 CFR 273.14(c) Note: cannot use the words “Used Pesticides”
      1. Is the original pesticide label or other approved label, also present? □ □ □
   c. Mercury-containing equipment (the word “thermostat” can be substituted for the words “containing equipment”) 40 CFR 273.14(d) □ □ □
   d. Lamps 40 CFR 273.14(e) □ □ □

12. Can the accumulation time (date became a waste or from receipt date) be demonstrated by date on container, date in accumulation area, date on individual waste items, inventory system, or other method? 40 CFR 273.15(c) □ □ □

13. Have employees been trained on proper management of universal waste? 40 CFR 273.16 □ □ □

14. Has there been a release of universal waste at this facility?
   If yes, was it cleaned up and a proper waste determination made on the cleaned up material? 40 CFR 273.17(b) □ □ □

15. Is universal waste sent to another universal waste handler or a destination facility?
   40 CFR 273.18(a)
   a. Has a shipment sent by this handler ever been rejected? (If yes, explain in additional information section.) □ □ □
   b. Has a shipment been sent to a foreign destination? (If yes, explain in additional information section.) □ □ □

   Note: Small quantity handlers are not required to keep records of shipments of universal waste.

**GENERATOR REQUIREMENTS**

16. Is the CESQG recycling, treating, or disposing of hazardous waste on-site in an acceptable manner? 40 CFR 261.5(g) □ □ □
   If yes, describe __________________________________________________________
   (If described on the waste stream table, don’t repeat here.)

17. If the CESQG is accumulating less than 55 lbs (25 kgs) of hazardous waste on-site, is the CESQG sending this waste off-site for treatment, storage, or disposal according to? 40 CFR 261.5(g) □ □ □
   If yes, describe __________________________________________________________
   (If described on the waste stream table, don’t repeat here.)
18. If the CESQG is accumulating 55 lbs (25 kgs) or more of hazardous waste, is the CESQG sending waste off-site for treatment, storage, or disposal, to a TSD or some other approved waste management facility (HHW)? KAR 28-31-262a(f)(2)(B)

19. Does generator package, label (flammable liquid, poison, etc.), and mark (consignee's or consignor's name and address, etc.) waste in accordance with the requirements outlined in 49 CFR Parts 172, 173, 178, and 179 (DOT)? 40 CFR 262.30 (package), 40 CFR 262.31 (label), 40 CFR 262.32(a) and (b) (mark)

20. Does the generator only use a transporter who has registered with KDHE and obtained an EPA Identification Number? KAR 28-31-262(a)(2)

CONTAINER MANAGEMENT REQUIREMENTS

NOTE: SAA refers to Satellite Accumulation Area. SAAs do not apply to CESQGs, whose containers must all meet storage requirements.

21. For the SAA, is 55-gallons or less of each waste stream accumulated at or near the point of generation, in one container, which is under the control of the operator of the process generating that waste? KAR 28-31-262(c)(6)

22. Is each container managed as a storage container within three days of no longer meeting the definition of a satellite container? 40 CFR 262.34(c)(2)

[Note: If this satellite container violation is cited, do not cite storage container violations (weekly inspections and accumulation start date) for the same containers.]

23. Is the accumulation start date marked on each storage container? 40 CFR 262.34(a)(2)

24. Is each container clearly marked with the words "Hazardous Waste"? 40 CFR 262.34(a)(3) [storage] or KAR 28-31-262(c)(7) [SAA]

25. Are all containers holding hazardous waste in good condition? 40 CFR 265.171

26. Are all containers holding hazardous waste compatible with the contents? 40 CFR 265.172

27. Are all containers holding hazardous waste closed except when necessary to add or remove waste? 40 CFR 265.173(a)

28. Does the CESQG or KSQG conduct inspections at least every 31 days looking for signs of deterioration and leaks in containers in storage? KAR 28-31-262a(f)(2)(A) [CESQG] or KAR 28-31-262a(e)(2) [KSQG]

Or

Does the SQG or LQG conduct weekly inspections of areas where containers are stored for signs of leakage and/or deterioration caused by corrosion or other factors? 40 CFR 265.174

29. If the answer to question 28 was yes, are these inspections documented in a log that includes complete date and time of inspection, name of inspector, notations of observations, and date and nature of remedial actions? 40 CFR 265.15(d)
30. Incompatible wastes:
   a. If incompatible wastes or incompatible wastes and materials were placed in the same
      container, were the requirements of 40 CFR 265.17(b) complied with? 40 CFR 265.177(a)  
   ☐ ☐ ☐
   b. If hazardous waste was placed in an unwashed container that previously held
      incompatible waste or material, were the requirements of 40 CFR 265.17(b) complied
      with? 40 CFR 265.177(b)  
   ☐ ☐ ☐
   c. If storage containers of hazardous waste are incompatible with any waste or other
      materials stored nearby, are the containers separated from the other materials by means
      of a dike, berm, wall or other means? 40 CFR 265.177(c)  
   ☐ ☐ ☐

31. Are storage containers holding ignitable or reactive waste(s) located at least 50 feet
    (15 meters) from the generator's property line? (LQG Only) 40 CFR 265.176  
   ☐ ☐ ☐

32. Are storage containers currently meeting all AA, BB, and CC requirements
    (LQG Only) 40 CFR 265.178  
   ☐ ☐ ☐

33. If the CESQG or KSQG is accumulating (including SAAs) 2,200 lbs (1,000 kgs) or more of
    hazardous waste, check yes and continue with SQG generator requirements.  
   ☐ ☐

34. If the CESQG or KSQG or SQG is accumulating (including SAAs) 2.2 lbs (1 kgs) or more of
    acutely hazardous waste, check yes and continue with LQG generator requirements.  
   ☐ ☐

   (If Accumulating CESQG, <2,200 lbs, stop here)

35. Is the SQG storing 13,200 lbs (6,000 kgs) or less of hazardous waste for 180 days or less
    (270 days if transporting waste more than 200 highway miles)? 40 CFR 262.34(d)  
   ☐ ☐ ☐

36. Is the LQG storing hazardous waste for 90 days or less? 40 CFR 262.34(a)  
   ☐ ☐ ☐

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**REPORTING AND RECORDKEEPING**

37. Has the generator (KSQG, SQG, and LQG) submitted an annual monitoring fee and report to
    KDHE indicating their current generator status on a form provided by the department?
    (LQGs are required to pay the annual fee every year, but this report is only required to be
    submitted in the odd years when the biennial report is not submitted.)  
    ☐ ☐ ☐

    KAR 28-31-262a(b) (if neither report nor fee were submitted)
    KAR 28-31-10(a) (if only fee is missing)

38. If yes to number 37, was a copy of the report kept for a minimum of 3 years after the
    date of the signature on the report? KAR 28-31-262a(b)(4)  
    ☐ ☐ ☐

39. Has the LQG submitted biennial report(s) to KDHE by March 1 of even years?  
    40 CFR 262.41(a)  
    a. Does the LQG retain a copy of the biennial report for three years? 40 CFR 262.40(b)  
       ☐ ☐ ☐

40. If the generator has exported/imported hazardous waste to/from a foreign source,
    did they comply with the requirements of 40 CFR 262.53(a), 40 CFR 262.54, and/or
    40 CFR 262.60(a)?  
    ☐ ☐ ☐
If hazardous waste was exported or imported to/from a foreign source, please describe under “additional information”.
If the KSQG or SQG is not accumulating hazardous waste on-site, skip to question 47.

41. Has the KSQG or SQG designated at least one employee as an emergency coordinator and are they on the premises or available to respond to an emergency by reaching the facility within a short period of time (30 minutes)? 40 CFR 262.34(d)(5)(i)  

42. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? 40 CFR 262.34(d)(5)(iv)

43. Is the following information posted next to at least one telephone which is accessible with little or no delay in an emergency? 40 CFR 262.34(d)(5)(ii)  
   a. Name and telephone number of emergency coordinator(s)? 40 CFR 262.34(d)(5)(ii)(A)
   b. Location of fire extinguishers and spill-control material, and if available, fire alarms? 40 CFR 262.34(d)(5)(ii)(B)
   c. Telephone number of fire department unless facility has a direct alarm (911 is acceptable)? 40 CFR 262.34(d)(5)(ii)(C)

44. If the facility has no telephone (land line), and relies solely on cell phones:  
   a. Is the information required in 42a through 42c posted on wall so that it can be readily seen by employees? KAR 28-31-262(c)(8)
   b. Have the phone numbers required in 42a and 42c been programmed into the cell phones of management personnel? KAR 28-31-262(c)(8)

45. Has the KSQG or SQG established a hazardous waste management training program meeting the requirements of 40 CFR 262.34(d)(5)(iii)?  
   a. Are new personnel trained within six months after their employment or placement to a new position? KAR 28-31-262(a)(1) (SQG) or KAR 28-31-262(a)(4) (KSQG)
   b. After initial training, are employees trained on an annual basis? KAR 28-31-262(a)(1)(B) (SQG) or KAR 28-31-262(a)(4)(B) (KSQG)
   c. Was a record kept of the name of each employee trained, the date of the training, and the topics covered in the training KAR 28-31-262(a)(4)(A) (KSQG) or KAR 28-31-262(a)(4)(B) (KSQG)
   d. Was the record of training kept for three years from the date of the training? KAR 28-31-262(a)(4)(C) (KSQG)
   e. If the KSQG or SQG relies on cell phones, have employees managing hazardous waste been trained on the locations of these postings? KAR 28-31-262(c)(8)

PERSONNEL TRAINING FOR LQGs

46. Has the LQG established a hazardous waste management training program? 40 CFR 265.16(a)(1)  
   a. Is the program directed by a person trained in hazardous waste management? 40 CFR 265.16(a)(2)
   b. Are new personnel trained within six months after their employment or placement to a new position? 40 CFR 265.16(b)
c. Are new employees supervised until training is completed? 40 CFR 265.16(b)  ☐  ☐  ☐
MANIFEST REQUIREMENTS

47. If a contractual agreement is used in place of manifesting, (KSQG and SQG only)
   a. Does the contractual agreement include the type of waste and frequency
      of shipments? 40 CFR 262.20(e)(1)(i)  
   b. Is the vehicle used to transport the waste owned and operated by the
      reclaimer of the waste? 40 CFR 262.20(e)(1)(ii)  
   c. Is a copy of the agreement kept for a period of at least three years after
      termination of agreement? 40 CFR 262.20(e)(2)

48. If required, is a hazardous waste manifest used? 40 CFR 262.20(a)

49. If yes to number 48, does the manifest include the following (numbers correspond to
    the appropriate section of the manifest)? 40 CFR 262.20(a)
   1. Generator EPA identification number (12-digit)
   2. Number of pages?
   3. Emergency response phone number?  
      (may be entered after manifest item 9b only if different emergency response
      number(s) applies to different wastes on the manifest)
   4. Manifest Tracking Number (must be pre-printed)
   5. Generator's name, mailing address, phone number, and site address
   6. Transporter 1 company name and EPA ID number
   7. Transporter 2 company name and EPA ID number
      a. If more than 2 transporters were used, was a continuation sheet used?
   8. Designated facility name, site address, phone number, and EPA ID number?
   9. US DOT description (including proper shipping name, hazardous class
      or division, ID number, and packing group)
      9a. If hazardous and non-hazardous materials/wastes are listed on separate
      lines in Item 9b, is an "x" marked in item 9a next to the corresponding
      hazardous materials/wastes?
   10. Number and type of containers?
   11. Total quantity of waste?
   12. Unit of measure (weight or volume)?
   13. Waste codes (up to 6 can be entered)?
   14. Special handling instructions (if applicable)?
   15. Generator's/offeror's printed/typed name, signature, and date?
   16. Does the manifest apply to international shipment?
      If yes, did the primary exporter comply with all applicable requirements?
   17. Printed name, signature and dates received by transporter 1?
18. Printed name, signature and date received by transporter 2? □ □ □
50. Does the generator retain a copy of each initial manifest signed and dated by both generator and initial transporter until the copy signed and dated by the designated facility is received? 40 CFR 262.40(a)

51. Does the generator retain a copy of each manifest for three years that was signed and dated by a representative of the designated facility? 40 CFR 262.40(a)

52. If the LQG did not receive a copy of the manifest within 35 days that had been signed by the designated facility, did they contact the transporter and/or designated facility to determine the status of their hazardous waste? 40 CFR 262.42(a)(1)
   a. If the LQG was unable to locate their waste through contact with the transporter and/or designated facility, and still had not received a copy of the manifest within 45 days, did they file an exception report with KDHE? 40 CFR 262.42(a)(2)

53. If the KSQG or SQG did not receive a copy of the manifest within 60 days that had been signed by the designated facility, did they submit to KDHE a legible copy of the manifest with an explanation of the situation? 40 CFR 262.42(b)

**LAND DISPOSAL RESTRICTION REQUIREMENTS**

54. If the generator’s waste is not subject to the Land Disposal Restrictions regulations, please explain why: ____________________________

55. If the SQG or LQG sent waste meeting or not meeting the treatment standards to an off-site TSDF, did the generator provide a one-time written notice for each different waste stream? 40 CFR 268.7(a)(2) (not meeting treatment standards) or 40 CFR 268.7(a)(3) (meeting treatment standards)
   a. Did the notice include the following (mark each that it includes):
      □ EPA hazardous waste numbers (waste codes);
      □ manifest number for first shipment of waste;
      □ Constituents of concern for F001-F005, F039, and underlying hazardous Constituents in characteristic wastes (unless the waste will be treated and monitored for all constituents. If all constituents will be treated and monitored, there is no need to put them all on the LDR notice)
      □ applicable wastewater or non-wastewater category and subdivisions
      □ waste analysis data (if available)
   b. If the generator chose not to make the determination of whether his/her waste must be treated, did he/she provide a one-time written notice that includes EPA hazardous waste numbers (waste codes); manifest number of the first shipment; and states “This hazardous waste may or may not be subject to the LDR treatment standards. The treatment facility must make the determination.”? 40 CFR 268.7(a)(2)
   c. If the waste met the treatment standards, did the notice include the required certification statement? 40 CFR 268.7(a)(3)

56. If the KSQG, SQG, or LQG treated waste in tanks or containers to meet applicable treatment standards:
   a. Did the generator have a written waste analysis plan on-site describing procedures used to comply with the treatment standards? 40 CFR 268.7(a)(5)
   b. If the generator sent the treated waste off-site, did the generator provide a notice and signed certification statement with the initial shipment? 40 CFR 268.7(a)(5)(iii)
57. Has the SQG or LQG retained copies of all notices, certifications, waste analysis data, and other documents for at least 3 years from the last date the corresponding waste was last managed on-site or shipped off-site?  
40 CFR 268.7(a)(8)  

58. If the SQG or LQG is managing a labpack and using with the initial shipment of waste the alternate treatment standards found at 40 CFR 268.42(c), did they provide a notice that includes the required certification statement? 40 CFR 268.7(a)(9)  

59. If the SQG or LQG claims that their characteristic waste, including all applicable underlying hazardous constituents, is no longer hazardous, does the generator maintain a current, signed, one-time notice in their files? 40 CFR 268.9(d)  

Note: If a generator's waste is subject to any Land Disposal Restriction regulations not covered above, then please discuss these situations under “additional information”.

### PREPAREDNESS AND PREVENTION REQUIREMENTS

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<tr>
<th>YES</th>
<th>NO</th>
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<td>57.</td>
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<td>58.</td>
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60. Has the generator maintained and operated the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents? 40 CFR 265.31  

61. If appropriate, based upon the nature and quantity of each waste generated and stored at the facility, is the facility equipped with:  
   a. Internal communications or alarm system easily accessible in case of emergency? 40 CFR 265.32(a)  
   b. Telephone or hand-held two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? 40 CFR 265.32(b)  
   c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? 40 CFR 265.32(c)  
   d. Water of adequate volume and pressure to supply hose streams, or foam producing equipment, automatic sprinklers, or water spray systems? 40 CFR 265.32(d)  

62. Is the equipment (60a-60c above) tested and maintained to ensure its proper operation? 40 CFR 265.33  

63. Do personnel have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, when handling hazardous waste (unless such a device is not required under (40 CFR 265.32)? 40 CFR 265.34(a) and/or 40 CFR 265.34(b)  

64. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment, unless aisle space is not needed for any of these purposes? 40 CFR 265.35  

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65. **As appropriate**, for each type of waste handled, has the generator attempted to make the following arrangements:
   a. Familiarized the local emergency authorities with the facility layout, properties and hazards of each waste handled, locations of workers, entrances to facility roads, and possible evacuation routes? **40 CFR 265.37(a)(1)**
   b. Designated one authority where more than one police or fire department might respond to an emergency? **40 CFR 265.37(a)(2)**
   d. Familiarized local hospitals with the properties of hazardous waste handled and types of injuries or illnesses which could result from fires, explosions, or releases at the facility? **40 CFR 265.37(a)(4)**

66. In cases where state or local authorities decline to enter into such arrangements, is the refusal documented? **40 CFR 265.37(b)**

   *(If KSQG or SQG, stop here)*

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### CONTINGENCY PLAN FOR LQGs

67. Does the generator have a contingency plan? **40 CFR 265.51(a)**
   a. Does the plan list the name, home address, and phone numbers (home and office) of each designated emergency coordinator in the order in which they should be contacted? **40 CFR 265.52(d)**
   b. Is an emergency coordinator available at all times? **40 CFR 265.55**
   c. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste or hazardous constituents? **40 CFR 265.52(a)**
   d. Does the plan describe arrangements made with police, fire departments, hospitals, contractors, or any emergency response agency? **40 CFR 265.52(c)**
   e. Does the plan include an up to date list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of the capabilities of each item? **40 CFR 265.52(e)**
   f. Does the plan include an evacuation plan for facility personnel that describes signals to be used and evacuation routes? **40 CFR 265.52(f)**
   g. Has the plan been amended, if the following occurred: **40 CFR 265.54**
      1. Applicable regulations were revised? **40 CFR 265.54(a)**
      2. The plan failed in an emergency? **40 CFR 265.54(b)**
      3. There is an applicable change to the facility? **40 CFR 265.54(c)**
      4. The list of emergency coordinators changes? **40 CFR 265.54(d)**
      5. The list of emergency equipment changes? **40 CFR 265.54(e)**
   h. Is a copy of the plan and any revisions maintained at the facility? **40 CFR 265.53(a)**
   i. Have copies of the plan and any revisions been provided to the police and fire departments, hospitals, and any emergency response agency that may respond to an emergency? **40 CFR 265.53(b)**
   j. If implementation of the plan has been required at the facility, did the generator submit a written report on the incident to the KDHE within 15 days after the incident? **40 CFR 265.56(i)**

V# = Violation Number