

Facility Name \_\_\_\_\_

EPA I.D.# \_\_\_\_\_

Facility Rep. \_\_\_\_\_

Inspector \_\_\_\_\_ Date \_\_\_\_\_

RCRA LAND DISPOSAL RESTRICTIONS

GENERATOR COMPLIANCE (Complete this section for all Generators and TSDFs)

Waste Identification

A

1. Obtain copy of the generator's Annual Report. (Provide this to EPA with the checklist if violations are detected.)
2. Waste Codes listed in the Annual Report and evaluated during the inspection:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

3. For newly generated wastes, "one-time" wastes, wastes from cleanups, and other wastes not appearing on the Annual Report, provide the following:

<u>Waste Code(s)</u>	<u>Description (composition/source)</u>	<u>Subcategory/Treatability Group</u>	<u>Frequency/Amount Generated</u>	<u>Receiving Facility</u>
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4. Are the waste codes identified by the company correct? If NO, Explain:

<u>Company Code(s)</u>	<u>Suspected Code(s)</u>	<u>Reason/Explanation</u>
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5. Manifests reviewed from \_\_\_\_\_ (month/year)

GENERATOR COMPLIANCE

LDR Notifications

B

Shipments for which Notifications were NOT on file:

**NOTE** This section is for shipments of waste which were not accompanied by LDR notifications. This section should be completed when no notifications were on file for a particular waste code. If all notifications are on file, or only a few are missing for a particular waste code, DO NOT USE THIS SECTION, use sections C, D, or E.

1. No Notifications were on file for the following waste codes: \_\_\_\_\_

2. Is there an indication that these Notifications were sent and not retained? \_\_\_\_\_Y \_\_\_\_\_N

Please Explain; (for example: are blank notification forms on-site?)

3. [268.7(a)] Did the generator determine that these wastes were subject to LDR? \_\_\_\_\_Y \_\_\_\_\_N

Please Explain; (for example, was there any evidence of a determination?, did the generator have any knowledge of the regulations?)

Was this determination correct? \_\_\_\_\_Y \_\_\_\_\_N If NO, Explain:

4. List of shipments for which NOTIFICATIONS WERE NOT ON FILE:

<u>Manifest No.</u>	<u>Date</u>	<u>Waste Code(s)</u>	<u>Explanation</u> (incorrect determination?)
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(continue on back, if necessary)  
[Obtain Copies of Manifests, Where Possible]

NO NOTIFICATIONS ON FILE

Shipments for which notifications WERE sent:

C

1. WASTE EXCEEDS TREATMENT STANDARDS for: (waste codes) \_\_\_\_\_  
and notifications WERE on file. (if NONE, go to D)

2. [268.7(a)] Determination Based on:

For Waste Codes

Knowledge of wastes \_\_\_\_\_ Y  
TCLP \_\_\_\_\_ Y  
Total Waste Analysis \_\_\_\_\_ Y  
Other \_\_\_\_\_ Y

Basis \_\_\_\_\_  
Last Analysis: \_\_\_\_\_  
Last Analysis: \_\_\_\_\_  
Explain \_\_\_\_\_

3. Did generator identify all applicable waste codes? \_\_\_\_\_ Y \_\_\_\_\_ N

If NO, Explain and list wastes for which all waste codes were not identified:

Note: Even if the waste is identified as a listed waste code (F,K,P, or U), all pertinent characteristic waste codes (D) must also be listed. However, if the treatment standard for the listed waste code contains a standard for the characteristic constituent, the characteristic waste code need not be included. For example, A F006 sludge which contains lead at a concentration greater than 5 ppm does not have to be listed as a D006 as well since the F006 treatment standard contains a standard for lead. [268.9]

4. [268.7(a)(1)(i-iv)] For Each Waste, Did Notification Contain:  
(SEE APPENDIX I)

If NO, relevant  
Waste code(s)

(a) Waste Code(s) \_\_\_\_\_ Y \_\_\_\_\_ N  
(b) Manifest Number \_\_\_\_\_ Y \_\_\_\_\_ N  
(c) Waste Analysis Data \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_ Not Available

(d) Treatment Standard: {APPENDIX VIII}

For F001-F005, F039 and California List:

for example

F003:Acetone The specific Treatment Standard \_\_\_\_\_ Y \_\_\_\_\_ N  
all other spent (if a table is used, the specific constituent(s)  
solvents and treatability group must be identified)  
0.59 mg/l

For all other wastes: The specific Treatment Standard \_\_\_\_\_ Y \_\_\_\_\_ N

for example

Acid Corrosive <sup>or</sup> The Subcategory of the Waste \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_ N/A  
nonwastewater The Treatability Group \_\_\_\_\_ Y \_\_\_\_\_ N  
40CFR 268.42(a) Appropriate CFR Reference \_\_\_\_\_ Y \_\_\_\_\_ N  
DEACT For waste with treatment standards expressed as specified  
technologies; the five-letter treatment code \_\_\_\_\_ Y \_\_\_\_\_ N

5. [268.7(a)(6)] Did the generator retain copies of all Notifications \_\_\_\_\_ Y \_\_\_\_\_ N

(If there were any missing or inadequate notifications, please list them on page 5.)

WASTE EXCEEDS TREATMENT STANDARDS

Notifications WERE on file (continued):

D

1. WASTE MEETS ALL TREATMENT STANDARDS for: (waste codes) \_\_\_\_\_  
and notifications WERE on file. (if NONE, go to E)

2. [268.7(a)] Determination Based on:

	<u>For Waste Codes</u>	
Knowledge of wastes	_____Y	Basis _____
TCLP	_____Y	Last Analysis: _____
Total Waste Analysis	_____Y	Last Analysis: _____
Other	_____Y	Explain _____

**\*\* OBTAIN COPIES OF WASTE ANALYSIS DATA OR SUPPORTING DOCUMENTATION \*\***

3. Did generator identify all applicable waste codes? \_\_\_\_\_Y \_\_\_\_\_N

If NO, Explain and list wastes for which all waste codes were not identified:

4. [268.7(a)(2)(A-D)] Did Notification Contain: {SEE APPENDIX I}

Waste Code(s)	_____Y	_____N	
Treatment Standard	_____Y	_____N	(as outlined in Section C above)
Manifest Number	_____Y	_____N	
Waste Analysis Data	_____Y	_____N	_____Not Available

Certification Statement [268.7(a)(2)(ii)] \_\_\_\_\_Y \_\_\_\_\_N

5. [268.7(a)(6)] Did the generator retain copies of all  
Notifications/Certifications \_\_\_\_\_Y \_\_\_\_\_N

(If there were any missing or inadequate notif/certs, please list them on page 5.)

6. Based on the information provided (waste analysis data, type of waste), is the above NOTIFICATION/CERTIFICATION accurate? \_\_\_\_\_Y \_\_\_\_\_N  
(i.e., did the waste actually meet treatment standards?)

If NO, Explain:

WASTE MEETS TREATMENT STANDARDS

Notifications WERE on file (continued):

E

1. WASTE SUBJECT TO A National Capacity Extension (NCE) for: (waste codes) \_\_\_\_\_  
{SEE APPENDIX VI & VII} Case by Case Extension for: (waste codes) \_\_\_\_\_  
No Migration Petition for: (waste codes) \_\_\_\_\_  
and notifications WERE on file. (if NONE, go to CDE)

2. Based on the information provided (waste analysis data, type of waste), is the above NOTIFICATION accurate? \_\_\_\_\_Y \_\_\_\_\_N  
(i.e., are they actually subject to the extension/variance?)

Note: If a waste code subject to a NCE is also subject to the California List prohibition levels, that waste is no longer eligible for a NCE. The California List is as follows: Liquid hazardous wastes with cyanides  $\geq$  1000 mg/l, Liquid hazardous wastes containing: arsenic  $\geq$  500 mg/l, mercury  $\geq$  20 mg/l, cadmium  $\geq$  100 mg/l, nickel  $\geq$  134 mg/l, chromium VI  $\geq$  500 mg/l, selenium  $\geq$  100 mg/l, lead  $\geq$  500 mg/l, thallium  $\geq$  130 mg/l, and/or PCBs  $\geq$  50 ppm, Liquid hazardous wastes having a pH  $\leq$  2, Hazardous wastes  $\geq$  1000 ppm of Halogenated Organic Compounds (HOCs).

If no, Explain:

3. [268.7(a)(3)(i-v)] Did Notification Contain (for wastes subject to EXTENSION):  
{SEE APPENDIX I}

Waste Code(s) \_\_\_\_\_Y \_\_\_\_\_N  
Treatment Standard \_\_\_\_\_Y \_\_\_\_\_N (as outlined in Section C above)  
Manifest Number \_\_\_\_\_Y \_\_\_\_\_N  
Waste Analysis Data \_\_\_\_\_Y \_\_\_\_\_N \_\_\_\_\_Not Available  
Date the waste is subject to the Prohibitions \_\_\_\_\_Y \_\_\_\_\_N

4. [268.7(a)(6)] Did generator retain copies of all Notifications? \_\_\_\_\_Y \_\_\_\_\_N

(If there were any missing or inadequate notifications, please list them in CDE below.)

CDE

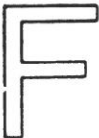
MISSING OR INADEQUATE NOTIFICATIONS? (for shipments of waste outlined in sections C, D, or E above.)

[list information and explain (not sent, not retained, no treatment standards?)]

From which section?  
Manifest No.      Date      Waste Code(s)      C, D, or E?      Explanation

[continue on back, if necessary][Obtain Copies of Manifests, Where Possible]

EXTENSION / VARIANCE  
MISSING, INADEQUATE



OTHER GENERATOR REQUIREMENTS

Generator Treatment Methods

- 1. Does the generator (non-TSDF) treat wastes (to meet the Treatment Standards) in containers or tanks.  Y  N

Please Explain: (which wastes, type of treatment, etc.)

If YES: (a) Has the generator developed a waste analysis plan for this activity? [268.7(a)(4)]  Y  N

(b) Has the generator submitted this plan to the Regional Administrator? [268.7(a)(4)]  Y  N

- 2. Does the generator dilute wastes as a part of any process regulated by other EPA programs (e.g. wastewater treatment system)  Y  N

Please Explain: (which wastes, how are they diluted, etc.)

If YES: Is a record kept indicating why the waste is not prohibited by the LDR?  Y  N

- 3. Is there any reason to believe that the generator may have impermissibly diluted the waste to change or achieve the applicable treatment standard? (based on review of process operation, pipe routing, and point of sampling)? [268.3] {SEE DILUTION FLOWCHART: APPENDIX IX}  Y  N

If YES, Please explain in detail: Use back of checklist or attach sheet.

- 4. Did the generator mix wastes with differing treatment standards for the same constituent?  Y  N

If so, did the generator select the most stringent treatment standard for each constituent? [268.41(b)]  Y  N

- 5. Has the generator conducted any type of remedial project or cleanup that may have generated waste subject to the LDR?  Y  N

Has information on this waste been included in sections B, C, D, or E of this checklist?  Y  N

Please explain the circumstances, wastes, and the methods by which the generator handled these wastes (i.e., was it a soil cleanup, was it properly classified, where was it shipped...):

(continue on back, if necessary)

OTHER GENERATOR REQUIREMENTS

G

1. Characteristic wastes treated so they are NO LONGER HAZARDOUS: \_\_\_\_\_  
(waste codes)

\*\* THESE PROVISIONS DO NOT APPLY TO CHARACTERISTIC WASTES  
WHICH ARE TREATED BUT STILL EXHIBIT THE CHARACTERISTIC \*\*

(If NONE, go to H)

Explain waste type and treatment process which removes characteristic:

2. Was this waste subsequently shipped to a Subtitle D  
(non-hazardous) landfill? \_\_\_\_\_Y \_\_\_\_\_N  
(If NO, go to H)

3. [268.9(d)] Did Generator (or treatment facility) Send a Notification/  
Certification to the Regional Administrator for each shipment of  
such waste to a Subtitle D land disposal facility (non-hazardous  
landfill)? \_\_\_\_\_Y \_\_\_\_\_N

4. [268.9(d)(1)(i-iii)] Did Notification Contain: {SEE APPENDIX I}

Name and Address of Subtitle D facility \_\_\_\_\_Y \_\_\_\_\_N

Description of Waste Initially Generated  
(including Hazardous Waste Number and Treatability Group) \_\_\_\_\_Y \_\_\_\_\_N

The Treatment Standards Applicable to the Waste  
at the Initial Point of Generation \_\_\_\_\_Y \_\_\_\_\_N

Certification Statement [269.9(d)(2); 268.7(b)(5)(i)] \_\_\_\_\_Y \_\_\_\_\_N

H

OTHER COMMENTS:

END GENERATOR CHECKLIST

FOR TREATMENT AND/OR STORAGE FACILITIES  
THIS CHECKLIST SHOULD BE COMPLETED AS WELL AS THE FOLLOWING PAGES

CHARACTERISTIC WASTES  
COMMENTS

TSE

Facility Name \_\_\_\_\_

EPA ID # \_\_\_\_\_

Facility Rep. \_\_\_\_\_

Inspector \_\_\_\_\_ Date \_\_\_\_\_

RCRA LAND DISPOSAL RESTRICTIONS

STORAGE AND/OR TREATMENT FACILITY COMPLIANCE (also complete generator checklist: GEN)

- 1. Are restricted wastes which exceed treatment standards either received from off-site or stored on-site for greater than 90 days?  Y  N

If yes, which wastes?

(Note: Wastes subject to extensions to the effective dates of the regulations are excluded from the storage requirements.)

- 2. Are restricted wastes which exceed treatment standards treated on-site? [268.7(b)]  Y  N

Describe the treatment process(es):  
(Consider: Was dilution used as a substitute for treatment?)

If Answers to both questions 1 & 2 are NO, complete generator checklist: GEN and stop here.

- 3. Are all containers and tanks clearly marked to identify: [268.50(a)(2)]

Content?  Y  N  
 Date entered storage?  Y  N

- 4. Do the operating records track: [264.73, 265.73 and 268.50(a)(2)(i) & (ii)]

Location of waste?  Y  N  
 Type of waste?  Y  N  
 Quantity?  Y  N  
 Date entered storage?  Y  N  
 Date removed from storage?  Y  N

- 5. For wastes generated on-site which are subsequently treated on-site, do the operating records contain, for each on-site transfer of waste: [264.73, 265.73]

Waste Code?  Y  N  
 Applicable Treatment Standard?  Y  N  
 Waste Analysis Data?  Y  N  Not Available

(i.e., the operating record should contain all information normally contained in the LDR Notification, with the exception of the Manifest number.)

STORAGE / TREATMENT FACILITY COMPLIANCE



6. Do the operating records agree with container labelling for restricted wastes in storage? [268.50(a)(2), 264.73 and 265.73] \_\_\_Y\_\_\_N
7. Are the restricted wastes in storage for less than 1 year? \_\_\_Y\_\_\_N  
 If stored  $\geq$  1 year, why?

(Note: LDR Wastes may be stored for more than a year if such storage is solely for the purpose of accumulation of quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal (e.g. enough waste to make up a load of waste). The burden of proof is on the facility for storage over one year.) [268.50(c)]

Waste Analysis Plans

8. Was the waste analysis plan (WAP) revised to cover land ban requirements? [268.7(b), 264.13 and 265.13] \_\_\_Y\_\_\_N
9. What is the frequency of testing provided in the WAP?
10. What types of analyses are conducted for which wastes?  
Waste Code(s)      Analysis

If facility stores only wastes generated on-site, complete generator checklist: GEN and stop here.

If facility accepts wastes for storage or treatment, complete remainder of checklist.

11. What, if any, procedures are used to identify discrepancies in manifests? (such as wastes for which all pertinent waste codes have not been identified)
12. Do the operating records include: [264.73, 265.73]
- Notifications and certifications received from generators, storage, and/or treatment facilities? \_\_\_Y\_\_\_N
- Waste analysis data? \_\_\_Y\_\_\_N

Further Off-Site Management: Also Complete Generator Checklist: GEN