Inspection Checklist
Universal Waste Lamp Handlers

Facility Name: _____

Identification Number: _____

Facility Address: _____

_____

Date Inspected: _____

Inspected By: _____

Type of Inspection: Annual ☐ Re-inspection ☐ Complaint ☐

DISCLAIMER

This checklist is intended to provide guidance only. This checklist does not replace or supersede relevant statutes and regulations. The information contained in this checklist is based upon the statutes and regulations in effect as of the date the checklist was signed. Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations.

Note: Refer to Title 22 of the California Code of Regulations for citations that start with the number 6. Refer to the Health and Safety Code for citations that start with the number 2.

Note: This checklist is an addendum to the "Inspection Checklist Universal Waste Handlers of Electronic Devices, CRTs & CRT Glass". This checklist is intended to cover those requirements specific to universal waste lamps.

REGULATED FACILITIES AND WASTE DEFINITIONS (66273.9):

Universal Waste Handler: a generator of universal waste, or the owner or operator of a facility.

Generator: any person, by site, whose act or process produces a hazardous waste (or universal waste), or whose act first causes a hazardous waste (or universal waste) to become subject to regulation.

Household: a private residence.

Conditionally Exempt Small Quantity Universal Waste Generator (CESQUWG): a generator of no more than 100 kilograms of RCRA hazardous waste (includes all universal waste except CRT materials) and no more than 1 kilogram of acutely hazardous waste in any calendar month, and remains in compliance with 40 CFR 261.5.

		Identification Number
☐		66273.32(a)(1) -- Failed to obtain a federal EPA Identification number before meeting or exceeding the 5,000 kilogram storage limit.
		Unauthorized Disposal and Statements
☐		66273.31(a) -- The universal waste lamp handler disposed of universal waste lamps at an unauthorized point.
☐		25189.2(a) -- Made false statements(s) in an application, label, manifest, record, report, permit or other document.
		Labeling of Universal Waste Lamps
☐		66273.34(c) -- Failed to properly label or mark universal waste lamps or container or package in which lamps are contained with the following phrase: "Universal Waste – Lamps".
		Accumulation Time
☐		66273.35(a) -- Accumulated universal waste lamps for longer than one year from the date the UW lamps were generated or received from another universal waste handler.
☐		66273.35(b) -- Failed to demonstrate the length of time that the UW lamps have been accumulated from the time they became a waste or were received.

		Use and Management of Containers
☐		66273.33(b) -- Failed to manage UW lamps in a way that prevents releases to the environment.
☐		66273.33(b)(1) -- Failed to contain UW lamps in a closed, structurally sound, compatible container that does not show evidence of leakage or damage.
		Treatment of Universal Waste Lamps
☐		25201(a) -- Performed unauthorized treatment using a tube crusher.
☐		66273.31(b) -- Performed unauthorized treatment of UW lamps by dilution or treatment not in response to a release.
		Response to Releases
☐		66273.33(b)(2) -- Failed to immediately cleanup and place in a container any UW lamp that is broken or shows evidence of a hazardous waste release to the environment.
☐		66273.33(b)(3) -- Failed to remove UW lamps from a product or structure in a manner designed to prevent breakage.
☐		66273.37(a) -- Failed to immediately contain all releases of UW lamps and other residuals from universal waste.
☐		66273.37(b) -- Failed to determine whether material resulting from a release of UW lamps is hazardous waste and, if so, manage the hazardous waste in compliance with all requirements (however, pursuant to 66273.37(c) hazardous waste consisting only of residues of leaking, broken, or otherwise damaged universal waste lamps may be managed as universal waste lamps provided that it is repackaged according to the standards of section 66273.33).
		Personnel Training
☐		66273.36(a) – Failed to ensure that all personnel who manage UW lamps from offsite sources at the universal waste handler's facility are thoroughly familiar with proper universal waste management and emergency response procedures, relative to those persons' responsibilities.
☐		66273.36(b) – Failed to initially train all personnel who manage or who supervise those who manage UW lamps from offsite sources.
☐		66273.36(b) – Failed to provide annual training to all personnel who manage or who supervise those who manage UW lamps from offsite sources.
☐		66273.36(b)(1) – Failed to include in the initial training materials the types and hazards associated with the universal waste that personnel may manage at the facility (e.g., hazards due to mercury in universal waste lamps);
☐		66273.36(b)(2) – Failed to include in the initial training materials the proper disposition of UW managed at the facility (e.g., the locations of universal waste container(s), or the location of a centralized universal waste accumulation area);
☐		66273.36(b)(3) – Initial training materials failed to include the proper procedures for responding to releases of universal wastes including the position titles and the means of contacting those personnel at the facility who are designated to respond to reports of releases and/or to respond to questions received from other personnel at the facility.
☐		66273.36(b)(4) – Failed to include in the initial training materials the applicable requirements of CCR title 22, Div. 4.5 Chapter 23 (including prohibition on the disposal of UW).
☐		66273.36(c) – Failed to maintain a written record by date indicating the names of personnel who received the training information specified in 66273.36(b).
☐		66273.36(d) – Failed to maintain training records specified in 66273.36(c) for at least three years from the date the person last managed any universal waste at the facility.
		Offsite Shipments
☐		66273.38(a) -- Sent or took UW lamps to a place other than another UW handler, a destination facility, or a foreign destination.
☐		66273.38(b) -- A UW handler that transports UW lamps offsite failed to comply with the UW transporter requirements.
☐		66273.38(c) -- A UW handler that offers UW that meets the definition of a hazardous material for off-site transportation failed to package, label, mark and placard the shipment according to applicable U.S. DOT regulations.
☐		66273.38(d) -- The originating UW handler failed to obtain an agreement from the receiving UW handler or destination facility prior to sending a shipment of UW.
☐		66273.38(e)(1) --When the UW shipment is rejected by another UW handler or destination facility, the originating UW handler failed to receive back the UW. **or**

☐		66273.38(e)(2) -- When the UW shipment is rejected by another UW handler or destination facility, the originating UW handler failed to send the UW to another UW destination facility or handler.
☐		66273.38(f)(1) -- The receiving UW handler that rejects a shipment of UW failed to notify the originating UW handler of the rejected load and return the UW to the originating UW handler, **or**
☐		66273.38(f)(2) -- Failed to agree with the originating UW handler to send the UW to another UW destination facility.
☐		66273.38(g) -- A UW handler that receives a shipment of UW lamps containing hazardous waste failed to notify DTSC of the shipment.
☐		66273.38(h) -- A UW handler that receives a shipment of non-hazardous, non-UW, failed to manage the waste in compliance with applicable federal, state, and local solid waste regulations.
		Tracking of UW Lamps
☐		66273.39(a) – Failed to keep a record of each shipment of UW lamps received at the handler's facility.
☐		66273.39(a)(1) -- Failed to record the name and address of the originating UW handler from which the UW was sent.
☐		66273.39(a)(2) – Failed to record the quantify of each type of UW received.
☐		66273.39(a)(3) – Failed to record the date of receipt of the shipment of UW lamps.
☐		66273.39(b) -- Received UW lamps from household generator and conditionally exempt small quantity UW generators, but failed to do the following:
☐		66273.39(b)(1) In lieu of the originating UW handler's name and address, record "household generator" and/or CESQUWG.
☐		66273.39(b)(2) -- Record the total quantity of each type of UW lamps as an aggregate from households and/or CESQUWGs.
☐		66273.39(c) -- Failed to keep a record of each shipment of UW lamps sent from the UW handler's facility to another facility.
☐		66273.39(c)(1) – Failed to record the name and address of the UW handler or destination facility to which the UW was sent.
☐		66273.39(c)(2) – Failed to record the quantity of each type of UW lamp sent.
☐		66273.39(c)(3) – Failed to record the date the shipment was sent.
☐		66273.39(d)(1) – Failed to retain each record described in (a) of this section for 3 years from the date of receipt of the corresponding shipment of UW.
☐		66273.39(d)(2) – Failed to retain each record described in (b) of this section for 3 years from the date of departure of the corresponding shipment of UW.
		Export of UW Lamps
☐		66273.40(a)(2)(A) and 66262.53(a) -- Exported UW lamps to a non-OECD country without filing a Notification of Intent to Export at least 60 days prior to export.
☐		66273.40(a)(1)--Exported to an OECD country without complying with article 8 of chapter 12.
☐		66262.53(a)(1) -- Filed a Notification of Intent to Export lacking the name, mailing address, telephone number, and/or ID number of the primary exporter.
☐		66262.53(a)(2)A -- Filed a Notification of Intent to Export lacking the waste numbers, Hazardous Waste Code Number, shipping name, hazard class, and UN/NA ID number, as applicable.
☐		66262.53(a)(2)B -- Filed a Notification of Intent to Export lacking information on the estimated frequency or rate at which the UW lamps are to be exported, and the period of time over which the UW lamps are to be exported.
☐		66262.53(a)(2)C -- Filed a Notification of Intent to Export lacking the estimated total quantity of UW, in units as specified on the Uniform Hazardous Waste Manifest.
☐		66262.53(a)(2)D -- Filed a Notification of Intent to Export lacking information on all points of entry to and departure from each foreign country through which the UW lamps will pass.
☐		66262.53(a)(2)E -- Filed a Notification of Intent to Export lacking a description of the means by which each shipment of UW lamps will be transported, and by what types of container.
☐		66262.53(a)(2)F -- Filed a Notification of Intent to Export lacking a description of the manner in which the UW lamps will be treated, stored, or disposed of in the receiving country.
☐		66262.53(a)(2)G -- Filed a Notification of Intent to Export lacking the name and site address of the consignee and any alternate consignee.

☐		66262.53(a)(2)H -- Filed a Notification of Intent to Export lacking the name of any transit countries through which the UW lamps will be sent, and a description of the approximate length of time the lamps will remain in the country and the nature of their handling while there.
☐		66262.56 -- Exported UW lamps but failed to file an annual export report with U.S. EPA and DTSC by March 1 of each year.
☐		66262.57 -- Exported UW lamps but failed to keep records of export notifications, or provide copies of export notifications as required.
☐		66273.40(a)(2)(B) – Exported UW lamps but failed to received consent and the EPA Acknowledgment of Consent.
☐		66273.40(a)(2)(C) – Exported UW lamps but failed to provide the transporter a copy of the EPA Acknowledgment of Consent.

COMMENTS:

This checklist (inspection report) will become a public document; you may request that any trade secret or facility security information be withheld from public disclosure. (See Health and Safety Code section 25173.) If you wish to assert the trade secret privilege, please provide DTSC specific written answers to each of the following questions, within 10 days of receipt of this inspection report:

- To what extent is there knowledge of the information conveyed by the photograph/document outside of your business?
- To what extent is there knowledge of the information conveyed by the photograph/document, by employees and others in your business?
- To what extent have measures been taken to guard the secrecy of the information?
- Is the information valuable to competitors? If so, why?
- Has there been substantial monetary expenditure in the development of the information?
- Could the information be easily and properly acquired or duplicated by others?

If applicable, DTSC will review your response to these questions to determine if the information should be treated as trade secret and will notify you of its decision.