

**CUPA**

Department/Division \_\_\_\_\_

Address \_\_\_\_\_

Phone: (xxx) xxx-xxxx Fax: (xxx) xxx-xxxx

Website: www.website.com

**HAZARDOUS WASTE INSPECTION FORM  
LARGE QUANTITY GENERATOR**

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

Site Address \_\_\_\_\_ Time In \_\_\_\_\_ Time Out \_\_\_\_\_

Owner/Operator \_\_\_\_\_ Phone \_\_\_\_\_

Type of Inspection

- Routine  Re-Inspection  
 Follow-up  Other \_\_\_\_\_

Inspection Consolidation

- Combined  Joint  Integrated  
 Multimedia  Solo

Inspector \_\_\_\_\_

Facility ID \_\_\_\_\_

Program Element \_\_\_\_\_

**CONSENT TO INSPECT GRANTED BY** Name: \_\_\_\_\_

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

Title: \_\_\_\_\_

*Inspection may involve obtaining photographs, reviewing and copying records, and determination of compliance.*

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M= Minor Viol, CII= Class II, CI= Class I

CODE	Y	N	N/A	HAZARDOUS WASTE REQUIREMENTS FOR LQGs	M CI CII
<b>Record Keeping/Documentation</b>					
LR01				Biennial Report submitted every even year (66262.41) and maintained onsite (66262.40(b))	
LR02				Hazardous waste determination was made for all wastes. <input type="checkbox"/> Analysis <input type="checkbox"/> Generator knowledge (66262.11)	
LR03				Contingency Plan is available for review (66265.53(a))	
LR04				Contingency Plan contains all required elements (66265.52) and is current (66265.54).	
LR05				Training plan is onsite (66265.16(d)) and complete (66265.16(a)(3))	
LR06				Documentation that training is provided to personnel annually (66265.16(c))	
LR07				Personnel have been provided training within 6 months of hire or taking a new position (66265.16(b))	
LR08				Manifests are complete (66262.23(a)(1))	
LR09				The "Generator copy" of each manifest is being submitted to DTSC (66262.21(f))	
LR10				TSDf signed copy of the manifest available is within 35 days of waste shipment. (66262.42(a))	
LR11				Bills of Lading for transportation of used oil on a Consolidated Manifest are present and complete (HSC 25160)	
LR12				LDRs are available and complete. (66268.7(a)(5)(C))	
LR13				Written inspection logs for tanks show daily inspections (66265.195(c))	
LR14				Onsite recycling is reported every two years using UPCF (HSC 25143.10)	
LR15				Tank integrity/containment assessment is complete (66265.192e)(1) & has been completed in past 5 years (66265.192(h)(1))	
<b>Container Management</b>					
LC01				Containers are in good condition. (66265.171) and compatible with the waste being held (66265.172)	
LC02				Containers holding ignitable and reactive wastes are more than 50 feet from property line (66265.176)	
LC03				Containers are closed except when adding or removing waste. (66265.173(a))	
LC04				Containers are inspected weekly. (66265.174)	
LC05				Contaminated empty containers are empty. (66261.7(b))	
LC06				"Empty" containers are marked with date emptied. (66262.7(f))	
LC07				Satellite accumulation containers are at or near the point of generation (66262.34(e)(1)(A))	
LC08				Satellite accumulation containers are under the control of an operator (66262.34(e)(1)(A))	
LC09				Satellite accumulation areas contain only one container per wastestream (66262.34(e)(2))	
LC10				Container >26 gal & holds VOC containing waste w/ >500 ppms is DOT approved, closed tight (66265.1087)	
LC11				Adequate aisle space is maintained to allow access to containers (66265.35)	
LC12				Exclude recyclable materials stored in accordance with local ordinance/hazardous materials codes. (HSC 25143.9(c))	
LC13				Facility is equipped with emergency equipment and alarms/communication system (66265.32)	
<b>Tank Management</b>					
LT01				Tanks are equipped with overflow prevention controls (66265.194)	
LT02				Tanks are equipped with secondary containment leak detection device (66265.192(j)(3))	
LT03				Tanks are inspected daily (66265.195)	
LT04				Tank <19,000 gal, holds VOC >500ppmw, has fixed roof (66265.1083(b) & 66265.1085(c))	
LT05				Tank holding VOCs that does not meet criteria above, has cover and control device (66265.1085(d))	





Guide to violations and violation codes found in left-most column of the inspection report/checklist

Code	Regulation, description, guidance
LR01	<b>Facility has filed a Biennial Report and maintained a copy.</b> Biennial reports must be filed in each even numbered year reporting amounts of waste generated and how each was handled. Reports may be filed with DTSC electronically, and a receipt of filing can be printed. Reports must be maintained for three years.
LR02	<b>Facility waste determinations.</b> Facilities must make waste determinations for all wastes. They can apply generator knowledge, but it must be based on knowledge of the waste or process. Guidance can be given regarding lab testing, indicating test methods or generic test names (e.g. fish bioassay or CAM-17 WET or pH) and certified labs for use.
LR03	<b>Contingency plan available for review.</b> A copy of the contingency plan must be kept onsite.
LR04	<b>Contingency plan required elements.</b> Contingency plans should address the following (at a minimum): actions to be taken in event of fire/explosion/release, arrangements (if any) with local response teams, name/address/phone number (home and office) of emergency coordinators, list of emergency equipment/description/location, evacuation plan, State OES emergency number (800-852-7550). HMBP & SPCC plans may be substituted IF all elements are present.
LR05	<b>Training plan is onsite and complete.</b> Training plans should address the following (at a minimum): employee response to emergencies, procedures for inspecting monitoring systems, operation of automatic feed cut off systems, alarm and communication systems, response to fires and explosions, and shutdown operations. Plan should be organized to include job title, employee name, job description, type and frequency of training to be provided.
LR06	<b>Training documentation is available.</b> Documentation showing that all elements of the plan outlined for each job title and employee must be updated annually and maintained.
LR07	<b>Personnel training provided within 6 months of hire.</b> Within the first 6 months, personnel must be supervised until they have been trained in the requirements of job.
LR08	<b>Manifests are complete.</b> Generators are responsible for Items 1-15 on the manifest. Generator site address may be blank if same as mailing address. Item 9a may be marked "RQ" to indicate a reportable quantity is being shipped. Item 9a may be left blank if all items on the manifest being shipped are DOT regulated (but it is recommended that any DOT regulated material be marked, regardless). Both federal and state waste codes need to be entered in Item 13, leave blank if none.
LR09	<b>Generator copy sent to DTSC.</b> New manifests do not have "mail to" address on the form any longer. Requirement to submit to State still exists. Copies (photocopy or original after TSDf copy is received) should be sent to DTSC Generator Manifests, P.O. Box 400, Sacramento, CA 95812-0400. No proof of submission is required. Inspectors may look at HWTS to determine if copies have been received (look for "Y" in the "Paired" column to start), but be aware that data entry to HWTS may lag by up to 6 months.
LR10	<b>TSDf copy available w/in 35 days.</b> TSDf copies should be received within 35 days of shipment. If not, generators should contact TSDf to determine status. If copy not received within 45 days, an exception report should be submitted to DTSC.
LR11	<b>Bill of Lading for transporting used oil.</b> LQGs may use consolidated manifesting for transport of used oil. Transporters should leave receipt (Bill of Lading) showing waste, quantity, shipper, TSDf, and date of shipment.
LR12	<b>LDRs.</b> LDR notifications must go with all RCRA wastes. Look for LDRs for each waste with a federal waste code in Item 13 of the manifest. LDRs should show what the waste (or code) is and the minimum treatment standard. Can send one LDR per waste each year if waste and receiving facility do not change throughout that year.
LR13	<b>Tank inspection logs.</b> Tanks must be inspected daily for leaks, cracks or corrosion, to ensure that spill control equipment is in working order, containment is in good condition, and freeboard is maintained (for open topped tanks)
LR14	<b>Submitting a recycling report.</b> Facilities that recycle more than 100 kg of waste for re-use onsite have to fill out a report form. Onsite recycling includes reuse of wastewater in plating baths, antifreeze recycling units, and re-circulating solvent sinks. Facilities may need help determining which exemption applies to them when filing the form.

LR15	<b>Tank integrity and containment assessment.</b> Tanks used to hold waste must have an integrity assessment conducted every 5 years. Assessments should address tank construction, design, seismic anchoring, thickness of shell, estimated life remaining, compatibility with contents, and condition and construction of containment area. Ancillary equipment such as piping should be included. Final assessment must be signed by a P.E. Guidance on contents of assessments available at <a href="http://www.calcupa.net/technical/hazwaste/index.html">http://www.calcupa.net/technical/hazwaste/index.html</a> and <a href="http://www.unidocs.org/hazmat/hazardous-waste/index.html">http://www.unidocs.org/hazmat/hazardous-waste/index.html</a> .
LC01	<b>Containers in good condition and compatible with contents.</b> Containers holding waste should be free of severe rust, major dents and leakage, and compatible with their contents.
LC02	<b>Ignitables/Reactives 50 feet from property line.</b> Containers holding ignitable and/or reactive wastes must be stored at least 50 feet from the property line.
LC03	<b>Containers not closed.</b> Containers must be kept closed unless adding or removing waste. For liquid wastes, closed should include a tightened bung or valved funnel, while non-dispersible solids may have the lid loosely fitted but not secured during the workday.
LC04	<b>Inspecting containers weekly.</b> While inspections are required, logs are not required to be kept. Look for signs that containers aren't being inspected such as improper labeling, open containers or containers in poor condition.
LC05	<b>Empty containers not empty.</b> Empty containers may not have a steady stream of liquid escape when inverted or solids must be scraped clear as much as practical. Empty containers may still have some waste in them after emptying from settling of residues-ensure the facility took measures to make the container empty (i.e. inverted it over new drum).
LC06	<b>Empty containers marked with date.</b> Empty containers must be marked with the date emptied, except when the empty container is shipped back to the supplier for re-filling with the same material (see 66261.7(i) for refilling requirements).
LC07	<b>Satellite: At or near point of generation.</b> Inspector's discretion for definition of "at or near". Wastes not at or near don't qualify for 1-year satellite accumulation rule, must be held to 90/180/270 day accumulation times.
LC08	<b>Satellite: Under control of operator.</b> Containers should be able to receive regular attention from a human being.
LC09	<b>Satellite: One container per wastestream.</b> Satellite accumulation rules allow only one container, up to 55 gallons in size, per satellite area <b>for each waste stream</b> unless it can be shown that it is not practical or safe to have only one.
LC10	<b>Containers holding VOCs (Subpart CC).</b> Containers larger than 26 gallons, that hold wastes with VOC contents greater than 500 ppm by weight (> than 20% by weight and which have a vapor pressure of greater than 2.25 mm Hg) must be kept in DOT approved containers and remain sealed unless adding or removing. If any of above criteria are not met, rule does not apply ("light duty"). If facility cannot prove that criteria are not met, rule applies.
LC11	<b>Aisle space.</b> Adequate space must be provided for all containers to allow for unobstructed access in the event of a problem.
LC12	<b>Excluded recyclable material storage.</b> These wastes are excluded, and not subject to Title 22 storage or accumulation rules, they are materials. Use fire code and local ordinance to govern storage (i.e. containment, occupancy segregation).
LC13	<b>Emergency equipment.</b> Facility must have an internal alarms system, a radio or telephone capable of summoning help, fire extinguishers, and spill control and decontamination equipment. A facility can demonstrate that it does not have the equipment if it is not required to mitigate the hazards posed by the wastes handled at that facility.
LT01	<b>Tanks equipped with overflow controls.</b> Tanks must have some spill prevention controls such as check valves, auto cut-offs, high level alarms, or standby tank bypass. 2' freeboard is required for open tanks if containment not present.
LT02	<b>Secondary containment leak detection.</b> Containment structures must have leak detection systems that can detect a leak into containment within 24 hours. Visual daily inspection may be substituted for installation of systems if the entire tank can be viewed.

LT03	<b>Tanks daily inspections.</b> Written tank inspection logs are required. Only applies to operating days (day tank is being used). Tank inspections should include condition of containment (including dryness), spill control, and corrosion.
LT04 LT05	<b>Tanks holding VOCs (Subpart CC).</b> If tank holds VOC containing wastes, is less than 19,000 gallons and the VOC containing waste has a vapor pressure less than 575 mm Hg it must have a fixed roof. If tank holds VOCs, but does not meet any of the criteria in LT03 (above), it must be covered and vented to control device, have an internal or external floating roof, or be a pressurized tank.
LA01	<b>Accumulation greater than time limits (Storage without a permit).</b> Hazardous wastes may not be accumulated for more than 90 days unless they meet satellite accumulation rules.
LA02 LA03	<b>Satellite accumulation for greater than 1 year.</b> Satellite wastes can be held for 1 year from first drop <b>OR</b> 90 days from time container is full, whichever comes first.
LA04	<b>"Empty" containers held greater than 1 year.</b> Empty containers should be sent offsite within 1 year for scrap value, reconditioning, reuse or refill if greater than 5 gallons. Those containers ≤5 gallons may be disposed of to a solid waste facility (with the trash) once "empty".
LA05	<b>Oil filters greater than 180 days/1 year.</b> A facility can hold up to one ton (≈4 drums of crushed or 8 drums of uncrushed) oil filters for 1 year. If the one ton limit is reached, the filters should be sent off within 180 days of the date the first filter was added to each container.
LA06	<b>Lead-acid batteries greater than 180 days/1 year.</b> A facility can hold up to one ton (≈65 batteries) of batteries for 1 year. If the one ton limit is reached the batteries should be sent off within 180 days of the date on the first battery collected.
LL01	<b>Labeling.</b> The facility shall clearly mark all containers with the following: 1) the words "Hazardous waste", 2) composition and physical state, 3) hazard property (e.g. toxic), 4) name and address of the generator, and 5) accumulation start date. All labels/markings must be visible for inspection.
LL02 LL03	<b>Satellite accumulation dates.</b> Satellite containers need to be marked with the date the first drop is added. This starts the 1 yr. limit. Satellite containers also need a second date once the container is full. This second date starts the 90 day clock. Satellite containers may not be held for more than 1 yr, or 90 days after being filled, whichever comes first.
LL04	<b>Marking "excluded recyclable materials".</b> Recyclable materials have the same labeling requirements as hazardous wastes, except that the words "excluded recyclable materials" must be marked instead of the words "hazardous waste".
LL05	<b>Oil Filter marking.</b> Filters must be marked with the words "Drained Used Oil Filters" and the date the first filter is added to the container. Drained fuel filters may be co-mingled and the container marked "used oil and gasoline filters"
LL06	<b>Lead Acid Battery marking.</b> Each battery must be marked with the date it is received or determined to no longer be usable. Damaged batteries must have the date written on the outside of the container holding the damaged battery.
LL07	<b>Used oil marking.</b> All tanks and containers that hold used oil destined for offsite recycling must be marked with the words "used oil". Used Oil containers do not have to have the physical state or hazardous properties marked on them.
LL08	<b>Tanks properly labeled.</b> Tanks must be marked with the words "Hazardous Waste", the contents of the tank, and the accumulation start date.
LU01	<b>Universal Waste marking/labeling.</b> UW are best marked as "universal waste- XXX". UW can be marked on each individual device or the outer container holding multiple devices. CRTs may use signage in an area in which CRTs are stored. Accumulation start dates may be marked on the device, the container, in an inventory log, or signage in an area.
LU02	<b>Universal Waste management.</b> UW needs to be managed in a way that prevents breakage or release to the environment. Commingling of items within a category (i.e. batteries) is allowed. Containers should be closed, structurally sound and compatible with the contents if breakage occurs.

LU03	<b>Universal Waste Accumulation times.</b> Universal waste may be stored up to one year. Storage for more than one year may be allowed only if done to facilitate accumulating enough for proper disposal. The burden of proof is on the handler.
LU04	<b>Universal Waste paperwork.</b> Records of each shipment must be kept. Records may be in the form of bills of lading, a logbook, , invoice or manifest. The record must include date, quantity, type of UW, and to whom it was shipped.
LM01	<b>Illegal Treatment.</b> A permit or authorization (PBR/CA/CE) is needed to treat hazardous waste. Treatment is defined as: method, technique or process that changes the physical, chemical or biological character or composition or a waste <b>AND</b> causes the waste to become non- or less hazardous. Many activities have been specifically exempted from this: (1) adding absorbent that changes only the physical state of the waste, (2) dilution that does not result in a less hazardous waste, (3) mixing like wastes for consolidation prior to offsite shipment, and (4) without adding heat, chemicals or pressure (a) sieving or filtering liquids to remove solid fractions, (b) phase separation during accumulation, or (c) evaporation of water.
LM02	<b>Failed to use registered transporter/used consolidated manifest when not eligible.</b> All transporters, including consolidated transporters need to have registered with DTSC. List of registered transporters can be found at 916-255-4368 or at <a href="http://www.dtsc.ca.gov/database/Transporters/Trans000.cfm">http://www.dtsc.ca.gov/database/Transporters/Trans000.cfm</a> . Generators may not offer waste for transportation to unregistered transporters. If noted, please refer the transporter to DTSC for follow-up/enforcement.
LM03	<b>Illegal disposal.</b> Hazardous wastes must be sent to an authorized treatment, storage or disposal facility. Application of wastes to land is prohibited. Allowing hazardous waste to fall on the ground or be carried by the wind can be cited as illegal disposal, whether the act is intentional or negligent.
LM04	<b>Failure to minimize releases.</b> Facilities must be maintained and operated in a manner that minimizes releases and the possibility of releases. Releases need not be ongoing or repeat to be considered.
LM05	<b>Emergency equipment maintenance.</b> All emergency equipment listed in the contingency plan should be tested and found to be in good working order "as needed". Generally, eyewash/showers are tested weekly, fire extinguishers annually.