

## Optional Information

Name of School:

Date of Inspection:

Vocational Program/Course/Room:

Signature of Inspector:

## **Hazardous Waste Self-Inspection Checklist**

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Guidelines: The United States Environmental Protection Agency (EPA) regulations governing cradle to grave management of hazardous wastes contained in the Resource Conservation & Recovery Act (RCRA) have been adopted and modified in the New Jersey Department of Environmental Protection (NJDEP) Hazardous Waste Regulations (N.J.A.C. 7:26G-1 et seq.).

### Waste Determination

The first question which you must ask is whether or not your program generates hazardous wastes, in regulated quantities. This is not an easy task, since you not only need to determine if your waste is hazardous and what quantity is being generated, but also whether or not anyone else at your facility (school) is also generating hazardous waste. It is advisable to ask for assistance from the New Jersey Department of Environmental Protection in helping you decide what to do. You may need the help of an outside expert. Let's try and break this down into easier to digest steps.

The first thing you should do is to identify the various departments or programs at your facility (school) which generate wastes. You must then review these wastes to determine if they are regulated hazardous wastes.

To determine if the wastes are regulated hazardous wastes, you must see if the source of the waste is specifically identified as a listed waste. Because the lists are very large, they have not been included in this checklist. You must get copies of the lists and regulations from the NJDEP. The first list of non-specific sources of hazardous wastes is found at 40 CFR 261.31. Typically this list would include spent solvents which are used in some chemistry labs, art and print shops, and vehicle and building maintenance operations.

If your wastes are not found in 40 CFR 261.31, you must then review the list of hazardous wastes from specific sources found at 40 CFR 261.32. It is unlikely that a school facility would generate wastes found on this list, however, it should be reviewed to be certain.

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If the waste is not identified in 40 CFR 261.31 or 261.32, then you must also check the list of discarded chemicals found at 40 CFR 261.33. Keep in mind that this list applies only to pure chemicals or spills of these chemicals. Even if you find a listed chemical as an ingredient in a waste planned for disposal, the chemical must be the sole active ingredient for it to be considered the chemical listed at 40 CFR 261.33.

If after reviewing the listed sources identified above, you were unable to identify your waste, you must then test your waste or using knowledge of the material determine if your waste exhibits any of the following characteristics of a hazardous waste:

Is the waste ignitable? [40 CFR 261.21]

- The waste must be a liquid with a flash point below 140 degrees Fahrenheit.
- The waste is not a liquid and is capable of causing fire through friction, absorption of moisture or spontaneous chemical changes.
- The waste is an ignitable compressed gas.
- The waste is classified as an oxidizer by the United States Department of Transportation.

Is the waste corrosive? [40 CFR 261.22]

- The waste must be a liquid with a pH less than or equal to 2 or has a pH greater than or equal to 12.5.
- The waste is a liquid and corrodes steel at a rate greater than 6.35 mm per year.

Is the waste reactive? [40 CFR 261.33]

- The waste is unstable and readily undergoes violent reaction without detonation.
- The waste reacts violently with water.
- The waste when mixed with water forms potentially explosive mixtures.
- The waste when mixed with water forms toxic gases or fumes.
- The waste contains cyanide or sulfides which generate toxic gases when exposed to a pH less than or equal to 2 or greater than or equal to 12.5.

Is the waste toxic? [40 CFR 261.24]

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Does the waste contain leachable levels of certain metals or chemical contaminants listed in Table 1 at 40 CFR 261.24? This is typically determined by performing a Toxicity Characteristic Leaching Procedure or TCLP test.

#### Generator Status

Once you have determined that you have hazardous waste, you must also determine if you have a regulated quantity of waste. This is the total quantity of hazardous waste at your facility, not just per waste stream. If in a calendar month you generate more than 100 kg (220 lb) of a hazardous waste or more than 1 kg (2.2 lb) of an acute hazardous waste, or accumulate at any time more than a total of 1,000 kg (2,200 lb) of hazardous waste, you are a regulated generator and must obtain an EPA ID number from the EPA. If you generate 1000 kg (2,200 lbs) or more of hazardous waste or more than 1 kg (2.2 lbs) of acute hazardous waste, you are a Large Quantity Generator (LQG). If you generate more than 100 kg ( 220 lb) of hazardous waste and less than 1000 kg ( 2,200 lb) of a hazardous waste, you are a Small Quantity Generator (SQG). If you generate or accumulate quantities of hazardous waste in amounts less than a SOG, you are a Conditionally Exempt Small Quantity Generator (CESOG) and subject to reduced regulatory requirements at 40 CFR 261.5

#### Registration

EPA ID numbers can be obtained by contacting:

USEPA - Region II  
Permits Administration Branch  
290 Broadway New  
York, NY 10007  
(212) 637-4106

Ask for Form 8700-12 when requesting an EPA ID number.

Even if you generate below regulatory quantities, you may still obtain an EPA ID number from EPA, however, these numbers are permanent and could subject your facility to inspections and associated fees. A better alternative for facilities which generate and accumulate hazardous wastes below regulatory limits is to obtain an "NJX" from the New Jersey Department of Environmental Protection Bureau of Advisement and Manifests. To obtain an "NJX" number, please write to:

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NJDEP - Division of Solid & Hazardous Waste Bureau of  
Hazardous Waste Regulation - Manifest Section  
P.O. Box 421, Trenton, NJ 08625-0421 (609)  
292-7081

The "NJX" number can only be used to manifest hazardous wastes in quantities below regulatory limits.

### Waste Handling Procedures

While your hazardous wastes are accumulated at your facility they must be managed in accordance with state and federal regulations. It is strongly recommended that you follow satellite regulations found at 40 CFR 262.34(c), as these are less burdensome and easier to follow.

### Satellite Accumulation

Satellite rules apply to "active drums" that are actively used to accumulate hazardous waste. Satellite rules can be followed as long as filled drums are moved to an authorized accumulation area within three days. A second drum can be utilized as a satellite drum until the original drum is moved to an authorized storage area.

This checklist does not address hazardous waste stored in tanks and treatment, storage and disposal (TSD) facilities. The questions that are most likely not the responsibility of the individual teacher are marked with an asterisk (\*) next to the number of the question. Questions marked with the symbol (☞) may require the help of an outside expert.

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Manifest/ Shipping Requirements

Please Circle

- 1.\* If the container is being shipped for disposal, have arrangements been made for a Licensed Treatment, Storage, and Disposal (TSD) facility to accept your hazardous wastes? [40 CFR 262.20] Y N N/A DK
- Note: Although the school is responsible for completing manifest forms, the TSD facility handling your waste should be consulted about completing the paperwork necessary to ship hazardous waste and/or contact NJDEP at (609) 292- 7081.
- 2.\* If the container is being shipped for disposal, have arrangements with a registered Hazardous Waste Hauler been made for transport of wastes to the TSD facility? [40 CFR 262.20] Y N N/A DK
- 3.\* Have NJ Hazardous waste manifests been completed for all shipments of hazardous wastes within NJ (or other State's Manifest for shipments to other States)? [40 CFR 262.20] Y N N/A DK
- 4.\* Has the manifest been completed according to the instructions in the Appendix to N.J.A.C. 7:26G-6? [N.J.A.C. 7.26G-6.1(c)3]
- 5.\* Has the manifest been signed and dated by the generator prior to the shipment leaving the site? [40 CFR 262.23(a) and N.J.A.C. 7:26G-6.1(c)3]

Comments/Corrective Action

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|-------|---|------------|
| 6.*   | Has a copy of the manifest with the signature of the initial transporter and date of shipment been retained by the school? [40 CFR 262.23]  | Y N N/A DK |
| 7.*   | Has the Hauler been supplied with all remaining copies of the manifest? [40 CFR 262.23]   | Y N N/A DK |
| 8.*   | Has a copy of the manifest been forwarded to the NJDEP and the destination state's environmental agency? [N.J.A.C. 7:26G-6.1(c)(6)]   | Y N N/A DK |
| 9.*☞  | Has a one-time Land Ban <i>certification</i> form been completed for wastes meeting the treatment standards and a copy kept on site? [40 CFR 268.7]                               | Y N N/A DK |
| 10.*☞ | Has a one-time Land Ban <i>notification</i> form been completed for wastes not meeting treatment standards and a copy kept on site? [40 CFR 268.7]                                | Y N N/A DK |
| 11.*☞ | Have appropriate markings and labels been affixed to containers prior to shipment? [40 CFR 262.31 and 262.32]   | Y N N/A DK |
| 12.*  | Has the Hauler's vehicle been inspected by the generator (or his/her designee) to ensure proper placarding before leaving the generators premises? [40 CFR 262.33]                | Y N N/A DK |
| 13.*  | Has the school kept a copy of each signed manifest and a copy signed by the owner and operator of the facility which received the waste for at least three years? [40 CFR 262.40] | Y N N/A DK |

Comments/Corrective Action

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Satellite Accumulation Sites

- |      |  |            |
|------|--|------------|
| 1.*☞ | Does the container accumulating hazardous waste meet US Department of Transportation container requirements if the container is to be used to transport the waste to another location? [40 CFR 262.30]   | Y N N/A DK |
| 2.*  | Is the container accumulating hazardous waste in good condition? [40 CFR 265.171]  | Y N N/A DK |
| 3.*  | Is the container accumulating hazardous waste compatible with the waste material? (For instance, solvents and paint waste should be placed in steel drums, but acidic or alkaline waste should not be placed in steel drums.) [40 CFR 265.172] | Y N N/A DK |
| 4.*  | Is the container accumulating hazardous waste kept securely closed when not in use? [40 CFR 265.173]   | Y N N/A DK |
| 5.*  | Is the container accumulating hazardous waste marked with the words "Hazardous Waste"? [40 CFR 262.34(c)]  | Y N N/A DK |
|      | Note: For satellite sites, other words that identify the contents of the containers may be used.   |            |
| 6*   | Is the container accumulating hazardous waste at or near the point of generation and under the operator's control? [40 CFR 262.34(c)]  | Y N N/A DK |
| 7.*  | Is the quantity of waste less than 55 gallons or less than 1 quart for acutely hazardous waste? [40 CFR 262.34(c)]   | Y N N/A DK |

Comments/Corrective Action

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8.\* If the quantities of hazardous waste exceed the amounts in question 7, are the containers moved within three days to a less than 90-day, 180-day or 270-day accumulation area or off site to an authorized facility? [40 CFR 262.34]

Y N N/A DK

Comments/Corrective Action

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Small Quantity Generator (Generate between 100 and 1,000 Kilograms of Hazardous Waste per Month)

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|------|--|------------|
| 1.*☞ | Does the container accumulating hazardous waste meet US Department of Transportation container requirements? [40 CFR 262.30]   | Y N N/A DK |
| 2.*  | Is the container accumulating hazardous waste in good condition? [40 CFR 265.171]  | Y N N/A DK |
| 3.*  | Is the container accumulating hazardous waste compatible with the waste material? (For instance, solvents and paint waste should be placed in steel drums, but acidic or alkaline waste should not be placed in steel drums.) [40 CFR 265.172] | Y N N/A DK |
| 4.*  | Is the container accumulating hazardous waste kept securely closed when not in use? [40 CFR 265.173]   | Y N N/A DK |
| 5.*  | Is the container accumulating hazardous waste marked with the words "Hazardous Waste"? [40 CFR 262.34(a)]  | Y N N/A DK |
| 6.*  | Have hazardous waste containers been accumulating at your facility for 180 days or less? [40 CFR 262.34(d)]  | Y N N/A DK |

Note: If you accumulate hazardous waste for more than 180 days, a permit must be maintained for the storage of hazardous waste and additional regulations apply which are not covered in this checklist. Contact the NJDEP for additional information. The quantity of waste accumulated on-site may never exceed 6,000 kilograms. Wastes may be accumulated for 270 days if transporting waste greater than 200 miles.

Comments/Corrective Action

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|------|---|------------|
| 7.*  | Are containers marked with the accumulation start date unless a satellite location? [40 CFR 262.34(a)]  | Y N N/A DK |
| 8.*  | Are container labels visible? [40 CFR 262.34(a)]  | Y N N/A DK |
| 9.*  | Are containers segregated according to waste type? [40 CFR 265.177]   | Y N N/A DK |
| 10.* | Are the containers inspected weekly? [40 CFR 265.174]   | Y N N/A DK |
| 11.* | Is there adequate aisle space between container rows? (18 inches between single stacked drums and 30 inches between double or triple stacked drums) [40 CFR 265.35] | Y N N/A DK |
| 12.* | Is there immediate access to communication or alarm systems whenever hazardous waste is poured, mixed or handled? [40 CFR 265.32 and 265.34]                        | Y N N/A DK |
| 13.* | Is there an adequate supply of fire extinguishers and spill control equipment in the accumulation area? [40 CFR 265.32]   | Y N N/A DK |
| 14.* | Is there adequate water pressure to supply fire hoses? [40 CFR 265.32]  | Y N N/A DK |
| 15.* | Is the fire fighting equipment, spill control and water supply tested and maintained? [40 CFR 265.33]   | Y N N/A DK |
| 16.* | Have the police, fire department and emergency response teams been familiarized with the layout of the facility? [40 CFR 265.37]                                    | Y N N/A DK |
| 17.* | Are there written agreements with emergency response contractors and equipment suppliers? [40 CFR 265.37]   | Y N N/A DK |

Comments/Corrective Action

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18.\* Have arrangements been made with the local hospitals to familiarize them with the properties of the hazardous waste handled at your facility and the types of injuries which may result from contact with these wastes? (This is usually a letter to the local hospitals identifying the wastes generated and the types of injuries that result from contact with the waste.) [40 CFR 265.37] Y N N/A DK

19.\* Is there an emergency coordinator on-site or on call who is available to respond to an emergency? [40 CFR 262.34(d)] Y N N/A DK

Note: The emergency coordinator or his designee must respond to any emergencies that arise.

20.\* Is the following information posted next to the telephone: the name and telephone number of the emergency coordinator; the location of fire extinguishers and spill control material, and, if present, fire alarm; and the telephone number of the fire department, unless the facility has a direct alarm? [40 CFR 262.34(d)] Y N N/A DK

Note: In the event of a fire, explosion or other release which could threaten human health outside the facility or the generator has knowledge that a spill has reached surface water, the generator must immediately notify the National Response Center (using their 24-hour toll free number 800- 424-8802.

21.\* Are all employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? [40 CFR 262.34(d)] Y N N/A DK

Comments/Corrective Action

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22.\* Has the school notified the NJDEP of any manifests which were not received for shipments made to a TSD facility within 60 days? [40 CFR 262.42(b)]

Y N N/A DK

Note: A copy of the manifest must be sent with a signed note stating the TSD facility signed copy is missing.

Comments/Corrective Action:

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Large Quantity Generator (Generate More than 1,000 Kilograms of Hazardous Waste per Month)

- |      |  |            |
|------|--|------------|
| 1.*☞ | Does the container accumulating hazardous waste meet US Department of Transportation container requirements? [40 CFR 262.30]   | Y N N/A DK |
| 2.*  | Is the container accumulating hazardous waste in good condition? [40 CFR 265.171]  | Y N N/A DK |
| 3.*  | Is the container accumulating hazardous waste compatible with the waste material? (For instance, solvents and paint waste should be placed in steel drums, but acidic or alkaline waste should not be placed in steel drums.) [40 CFR 265.172] | Y N N/A DK |
| 4.*  | Is the container accumulating hazardous waste kept securely closed when not in use? [40 CFR 265.173]   | Y N N/A DK |
| 5.*  | Is the container accumulating hazardous waste marked with the words "Hazardous Waste"? [40 CFR 262.34(a)]  | Y N N/A DK |
| 6.*  | Have hazardous waste containers been accumulating at your facility for 90 days or less? [40 CFR 262.34 (a)]  | Y N N/A DK |

Note: If you accumulate hazardous waste for more than 90 days, a permit is required for the storage of hazardous waste additional regulations apply which are not covered in this checklist. Contact the NJDEP for additional information.

- |     |   |            |
|-----|---|------------|
| 7.* | Are containers marked with an accumulation start date unless a satellite location? [40 CFR 262.34(a)] | Y N N/A DK |
| 8.* | Are container labels visible? [40 CFR 262.34(a)]  | Y N N/A DK |

Comments/Corrective Action:

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|------|---|------------|
| 9.*  | Are containers segregated according to waste type? [40 CFR 265.177]   | Y N N/A DK |
| 10.* | Are the containers inspected weekly? [40 CFR 265.174]   | Y N N/A DK |
| 11.* | Are containers of ignitable and reactive wastes located greater than 50 feet from the facility's property line? [40 CFR 265.176]                                    | Y N N/A DK |
| 12.* | Is there adequate aisle space between container rows? (18 inches between single stacked drums and 30 inches between double or triple stacked drums) [40 CFR 265.35] | Y N N/A DK |
| 13.* | Is there immediate access to communication or alarm systems whenever hazardous waste is poured, mixed or handled? [40 CFR 265.32 and 265.34]                        | Y N N/A DK |
| 14.* | Is there an adequate supply of fire extinguishers and spill control equipment in the accumulation area? [40 CFR 265.32]   | Y N N/A DK |
| 15.* | Is there adequate water pressure to supply fire hoses? [40 CFR 265.32]  | Y N N/A DK |
| 16.* | Is the fire fighting equipment, spill control and water supply tested and maintained? [40 CFR 265.33]   | Y N N/A DK |
| 17.* | Have the police, fire department and emergency response teams been familiarized with the layout of the facility? [40 CFR 265.37]                                    | Y N N/A DK |
| 18.* | Are there written agreements with emergency response contractors and equipment suppliers? [40 CFR 265.37]   | Y N N/A DK |

Comments/Corrective Action:

- |      |   |            |
|------|---|------------|
| 19.* | Have arrangements been made with the local hospitals to familiarize them with the properties of the hazardous waste handled at your facility and the types of injuries which may result from contact with these wastes? (This is usually a letter to the local hospitals identifying the wastes generated and the types of injuries that result from contact with the waste.) [40 CFR 265.37] | Y N N/A DK |
| 20.* | Has a contingency plan been developed describing the actions to be taken by facility personnel in the event of a fire, explosion or hazardous waste release? [40 CFR 265.52(1), 265.51 and 265.56]  | Y N N/A DK |
| 21.* | Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services? [40 CFR 265.52(c)]  | Y N N/A DK |
| 22.* | Does the plan list telephone numbers (home & office) and addresses for the emergency coordinator and alternates? [40 CFR 265.52(d)]   | Y N N/A DK |
| 23.* | Does the plan list the locations and capabilities of emergency equipment kept at the school including fire extinguishers, spill control equipment and communications and alarm systems? [40 CFR 265.52]   | Y N N/A DK |
| 24.* | Does the plan include primary and alternate evacuation routes and the signal to be used to begin evacuation for students and teachers? [40 CFR 265.52(f)]   | Y N N/A DK |
| 25.* | Is a copy of the plan available at the school for inspection? [40 CFR 265.53]   | Y N N/A DK |

Comments/Corrective Action:

26.*	Has a copy of the plan been forwarded to local emergency agencies including police, fire, emergency medical, the local emergency planning committee, and any emergency response contractors who may be called upon during an incident? [40 CFR 265.53]	Y	N	N/A	DK
27.*	Are there provisions for updating the Contingency Plan as operations and/or personnel change? [40 CFR 265.54]	Y	N	N/A	DK
28.*	Is there an emergency coordinator on site or on call who is available to respond to an emergency? [40 CFR 265.55]	Y	N	N/A	DK
29.*	Are required emergency procedures followed during emergency situations? [40 CFR 265.56]	Y	N	N/A	DK
30.*	Is the training program directed by a person trained in hazardous waste management procedures? [40 CFR 264.16]	Y	N	N/A	DK
31.*	Is the training program designed to ensure that personnel are able to respond effectively to emergencies? [40 CFR 264.16]	Y	N	N/A	DK
32.*	Does the training program include: [40 CFR 264.16]				
a)	The use of personnel safety equipment?	Y	N	N/A	DK
b)	Procedures for using facility emergency and monitoring equipment?	Y	N	N/A	DK
c)	Procedures for utilizing communications or alarm systems?	Y	N	N/A	DK
d)	Response procedures for fires and explosions?	Y	N	N/A	DK
e)	Ground water contamination response procedures?	Y	N	N/A	DK

Comments/Corrective Action:

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- 33.\* Is training provided within 6 months of the date of employment or assignment to an area involving the handling of hazardous waste? [40 CFR 264.16] Y N N/A DK
- 34.\* Is training provided annually? [40 CFR 264.16] Y N N/A DK
- 35.\* Is training documented with the following information: 1) Job title for each position related to hazardous waste management and the name of the person filling each job; 2) A written job description; 3) A description of the training given; and 4) Documentation for each position above of actual training? [40 CFR 264.16] Y N N/A DK
- 36.\* Are training records maintained for at least three (3) years? [40 CFR 264.16] Y N N/A DK
- 37.\* Has the school contacted the transporter and/or owner or operator of the designated facility and notified the NJDEP of any manifests which were not received for shipments made to a TSD facility within 35 days? [40 CFR 262.42(a) and N.J.A.C. 7:26G-6.1(c)(11)] Y N N/A DK
- 38.\* Has an Exception Report been submitted to the NJDEP if the generator has not received a copy of the manifest within 45 days? [40 CFR 262.42(a)] Y N N/A DK
- Note: Efforts to obtain the manifest must be documented. Y N N/A DK
- 39.\* Has the school prepared and submitted a copy of a Biennial Report to the EPA Regional Administrator by March 1 of each even numbered year for all hazardous waste shipped off-site for treatment, storage or disposal? [40 CFR 262.41]

Comments/Corrective Action:

40.\* Are Biennial Reports and Exception reports kept on file for 3 years? [40 CFR 262.40]

Y N N/A DK

Comments/Corrective Action: