

**QUALITY ASSURANCE DIVISION TSD FACILITY STANDARDS APPRAISAL
CHECKLIST**

EVALUATION NUMBER: _____ **DATE:** _____ **EVALUATOR:** _____

FACILITY: _____

RESULT KEY				
S = SATISFACTORY U = UNSATISFACTORY N/A = NOT APPLICABLE NE = NOT EVALUATED				
Checklist Item Number	Reference Document <small>(Include No., Sect/Para)</small>	Verification Requirements	Result Key	Verification Conducted <small>Describe documents reviewed, Personnel interviews and activities observed.</small>
1	264.11	<p>Record the facility's EPA identification number.</p> <p>Every facility owner or operator must apply to EPA for an EPA identification number.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
2	264.13	<p>Describe the facility's general waste analysis plan.</p> <p>Before an owner or operator treats, stores, or disposes of any hazardous waste, or non-hazardous wastes, if applicable under 264.113(d), he must obtain a detailed chemical and physical analysis of a representative sample of the wastes.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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3	264.14	<p>Describe the facility's security system.</p> <p>(b)(1) A 24-hr. surveillance system which continuously monitors and controls entry onto the active portion of the facility.</p> <p>(b)(2) An artificial or natural barrier (e.g., fence, etc.) which completely surrounds the active portion of the facility.</p> <p>(c) Posted signs, "Danger-Unauthorized Personnel Keep Out" at each active portion of the facility.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
4	264.15	<p>Describe the facility's general inspection requirements.</p> <p>(a) The owner or operator must inspect the facility for malfunctions and deteriorations, operator errors, and discharges, which may be causing or may lead to:</p> <p>(1) release to the environment,</p> <p>(2) threat to human health</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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		<p>(b) The owner or operator must develop and follow a written schedule for inspecting:</p> <ul style="list-style-type: none"> (1) monitoring equipment (2) safety and emergency (3) security devices (4) operating and structural equipment 		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
5	264.15(d)	<p>How are the inspection records maintained?</p> <p>(d) The owner or operator must record inspections in an inspection log or summary. He must keep these records for at least three (3) years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observation made, and the date and nature of any repairs or other remedial actions.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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Checklist Item Number	Reference Document <small>(Include No., Sect/Para)</small>	Verification Requirements	Result Key	Verification Conducted <small>Describe documents reviewed, Personnel interviews and activities observed.</small>
		(c) Training records on current personnel must be kept until closure of the facility; training records on former employees must be kept for at least three (3) years from the date the employee last worked at the facility.		_____ _____ _____
8	264.17	<p>Are there any ignitable, reactive or incompatible wastes stored at the facility?</p> <p>If <u>YES</u>, what precautions are being taken concerning storage?</p> <p>(a) The owner or operator must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including but not limited to: open flames, smoking, cutting and welding, friction heat, sparks, spontaneous ignition, and radiant heat. "No Smoking" signs must be conspicuously placed in these storage area.</p>		_____ _____ _____ _____ _____ _____ _____

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		<p>(c) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.</p> <p>(d) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
11	264.33	<p>How often are the emergency equipment and systems tested for maintenance?</p> <p>All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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13	264.35	<p>What type of aisle space restrictions are mandated at the facility?</p> <p>The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, <u>unless</u> it can be demonstrated to the Regional Administrator that aisle space is not needed for any of these purposes.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
14	264.37	<p>What type of "mutual aid" agreements has the facility prepared with the surrounding community?</p> <p>(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations:</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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		(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.		_____ _____ _____ _____ _____
15	264.51	<p>Does the facility have a written Contingency Plan?</p> <p>(a) Each owner or operator must have a contingency plan for the facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water</p>		_____ _____ _____ _____ _____

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16	264.53	<p>Where is the Contingency Plan kept?</p> <p>A copy of the contingency plan and all revisions to the plan must be</p> <ul style="list-style-type: none"> (a) maintained at the facility; and (b) submitted to all local police departments, fire departments, hospitals, and State and local emergencies response teams that may be called upon to provide emergency services. 		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
17	264.54	<p>Have amendments to the contingency plan been made?</p> <p>The contingency plan must be reviewed, and immediately amended, if necessary, whenever:</p> <ul style="list-style-type: none"> (a) The facility permit is revised; (b) The plan fails in an emergency; (c) The facility changes design, construction, operation, maintenance, etc.; (d) The list of emergency coordinator changes; <p>or</p> <ul style="list-style-type: none"> (e) The list of emergency equipment changes. 		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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20	264.72	<p>Does the facility handle/check for discrepancies as outlined in 264.72?</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
21	264.73	<p>Does the facility have an Operating Record on-site?</p> <p>(b) The following information must be recorded, as it becomes available, and maintained in the operating record until closure of the facility:</p> <p>(1) A description and the quantity of each hazardous waste received, and the method(s) and dates(s) of its treatment, storage, or disposal at the facility as required by Appendix 1;</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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23	264.112	<p>Does the facility have a written closure plan prepared?</p> <p>(a)(1) The owner or operator of a hazardous waste management facility must have a written closure plan. In addition, certain surface impoundments and waste piles from which the owner or operator intends to remove or decontaminate the hazardous waste at partial or final closure and have contingent closure plans.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
24	264.143	<p>What type of financial assurance has been designated for closure?</p> <p>An owner or operator of each facility must establish financial assurance for closure of the facility. He must choose from the options as specified in paragraphs (a) through (f) of this section.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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25	264.147	<p>What type of financial responsibility does the facility maintain for sudden accidental occurrences?</p> <p>The owner or operator must have and maintain liability for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
26	264.171	<p>Are containers holding hazardous waste in good condition?</p> <p>If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in some other way that complies with the requirements of this part.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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27	264.172	<p>Are containers made of or lined with materials that are compatible with the waste being stored?</p> <p>The owner or operator must use a container made of or lined with materials which will not react with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
28	264.173	<p>Are containers of waste kept closed except when adding waste?</p> <p>(a) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste, so that the ability of the container to contain the waste is not impaired.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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		(b) A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.		_____ _____ _____ _____ _____
29	264.174	How frequently does the facility inspect its drums? At least weekly, the owner or operator must inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors.		_____ _____ _____ _____ _____

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31	264.176	<p>Does the facility store any ignitable or reactive waste onsite?</p> <p>If so, containers holding ignitable and reactive waste must be labeled at least 15 meters (about 50 feet) from the facility's property line.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
32	264.177	<p>Are Incompatible wastes segregated?</p> <p>(a) Incompatible waste or incompatible wastes and materials must not be placed in the same container, unless Section 264.17(b) is complied with.</p> <p>(b) Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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		(c) A storage container holding a hazardous waste that is compatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.		_____ _____ _____ _____ _____
33	264.191	<p>Does the facility have any underground storage tanks (USTs)?</p> <p>(a) For each existing tank system that does not have secondary containment meeting the requirements of Section 264.193; the owner or operator must determine that the tank is not leaking or is unfit for use.</p>		_____ _____ _____ _____ _____

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34	264.221	<p>Does the facility have any surface impoundments onsite?</p> <p>(a) Any surface impoundments that is not covered by paragraph (c) (new surface impoundments) must have a liner for all portion of the impoundment.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
35	264.226	<p>How frequently is the surface impoundment inspected?</p> <p>(b) While a surface impoundment is in operation, it must be inspected weekly and after storms to detect evidence of deterioration, sudden drops in the level of contents, and severe erosion.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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38	264.254	<p>How often is the waste pile inspected?</p> <p>While a waste pile is in operation, it must be inspected weekly and after storms to detect evidence of any of the following:</p> <ul style="list-style-type: none"> (1) Deterioration, (2) Proper functioning of wind dispersal control systems, where present; and (3) The presence of leachate in and proper functioning of leachate collection and removal systems. 		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
39	264.256	<p>Are there any ignitable or reactive waste stored in the waste pile?</p> <p>SAME REQUIREMENTS AS SUBPART K - SURFACE IMPOUNDMENTS</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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40	264.270 264.271	<p>Does the facility have a land treatment unit onsite?</p> <p>The regulations in this subpart apply to owners and operators of facilities that treat or dispose of hazardous waste in land treatment units, except as Section 264.1.</p> <p>(a) The Regional Administrator will specify in the facility permit the elements of the treatment program.</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
41	40 CFR 262.30 & 49 CFR 173.24, 173.25 & 173.510	<p>Does the drum(s) meet the standard packaging requirements as specified in DOT regulations?</p>		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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42	40 CFR 265.172; 49 CFR 173.24, 173.25 & 173.510	Is the container compatible with the wastes stored inside?		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
43	40 CFR 262.32(b); 49 CFR 172.304 & 172.400	Is there a hazardous waste label on the drum?		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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44	40 CFR 262.32(a) & 49 CFR 172.202(a)(1)	Is there a proper shipping name in the space provided?		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
45	49 CFR 172.101 & 172.203(c)	Does the shipping name have the work "waste" in it?		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

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46	49 CFR 172.202(a)(3)	Is the UN or NA number filled in?		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
47	40 CFR 262.32(b)	Is the Generator's name and address filled in?		<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>