Small Quantity and Very Small Quantity Generators Inspection Checklist
NORTH DAKOTA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE PROGRAM
Rev. 11/2021

Facility Name:	Facility Address:
State/EPA ID Number:	Telephone Number:
Facility Contact:	Title:
Date of Last Inspection:	
Type of Notification: SQG VSQG	

Yes	**No**	
		Is sampling or photographic equipment required?
		Is special safety or personal protection required?
		Is a hazardous waste file maintained?
		Did the facility conduct an episodic generation event? (Complete Episodic Generator List)

Inspection Type:	(unannounced) (announced) (CEI) (Complaint) (Multimedia) (Other)
Expected Waste Streams:	
Pre-inspection Interview:	
Time In:	Time Out:
Date of Inspection:	
Business type:	
Owner/Subsidiary of:	
Number of Employees:	
Other Comments:	

Participants:	**Position:**

This checklist includes Hazardous Waste requirements found in Article 33.1-24 NDAC. It is not an inclusive checklist of all requirements for hazardous waste generators. The applicable chapter and subsection are referenced after each item.

VSQG Checklist		
Yes	**No**	
		Has the generator determined if hazardous waste is produced? (33.1-24-03-02 and 33.1-24-03-26(2))
		In a calendar month, does the facility generate less than or equal to 1 kg of acute hazardous waste, 100 kg of non-acute hazardous waste or residues from the cleanup of hazardous waste? (33.1-24-03-03 and 33.1-24-03-26(1) If no, the facility is not considered a VSQG. Generator status must be accurately determined, and the inspection must be conducted at the appropriate classification.
		Has the very small quantity generator accumulated at any time greater than one kilogram [2.2 pounds] of acute hazardous waste or one hundred kilograms [220 pounds] of any residue or contaminated soil, water, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous waste? (33.1-24-03-26(3)) If yes, the facility is subject to LQG requirements.
		Has the very small quantity generator accumulated at any time one thousand kilograms [2,200 pounds] or greater of nonacute hazardous waste? (33.1-24-03-26(4)) If yes, all quantities of that hazardous waste are subject to SQG requirements.
		Is the waste sent to a permitted municipal waste landfill, industrial waste landfill, TSDR facility, or an LQG under the control of the owner/operator? (33.1-24-03-26(5))
		Does the generator mix his characteristic hazardous waste with nonhazardous waste? If the mixture meets one or more of the characteristics of hazardous waste then it is fully regulated. 33.1-24-03-03-(2)(e)
		Does the generator mix his listed hazardous waste with solid waste? If the resulting mixture exhibits a characteristic of hazardous waste, this resultant mixture is a newly-generated hazardous waste and must meet the condition for an SQG or LQG. (33.1-24-03-03(2)(e))
		Does the generator mix his hazardous waste with used oil? If so, the mixture is subject to sections 33.1-24-05-600 through 689
Comments:		

Special Considerations at This Facility (Check All That Apply)					
Episodic Event		Pharmaceutical Wastes		Used Oil Processor	
Used Oil Marketer		Other			

-If managing Used Oil and/or Universal Waste, see Checklists on page 7.

-If managing Hazardous Waste Pharmaceuticals, utilize the HWP checklist. (Separate Document)

-Episodic events checklist is located on page 8.

SQG Checklist		
General Facility Checklist		
Yes	**No**	
		Has the generator identified the waste streams and determined which wastes are hazardous? (33.1-24-03-02 and 33.1-24-03-28(1)) List waste streams: Equipment Y/N # units Size Service Cycle Parts Washers Carb/Brake Washer Distillation Unit Paint Gun Cleaners
		Are biennial reports maintained for at least three years from the due date (March 1st of even numbered years)? (33.1-24-03-13(2))
		Does the generator have copies of waste analysis, test results, or other determination for the last three years since TSDF verification? (33.1-24-03-13(3))
		Does the generator store their waste in tanks? If so, there are additional requirements for them. (33.1-24-03-28(3) and 33.1-24-03-28(6)(b))
Additional Comments:		

Contingency/Emergency Response and Training Checklist		
Yes	**No**	
		Is the facility equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel? (33.1-24-03-28(8)(b)(1))
		Is the facility equipped with a device such as a telephone or a hand-held two-way radio (immediately available at scene of operation) that is capable of summoning emergency assistance from local police and fire depts? (33.1-24-03-28(8)(b)(2))
		Is the facility equipped with fire extinguishers, fire control, spill control equipment, and decontamination equipment? (33.1-24-03-28(8)(b)(3))
		Is the facility equipped with water at adequate volume and pressure to supply hoses, sprinklers, foam-producing equipment? (33.1-24-03-28(8)(b)(4))
		Does the facility test and maintain the equipment listed above? (33.1-24-03-28(8)(c))
		Has the facility attempted to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility? (33.1-24-03-28 (8)(f))
		Has the facility designated an emergency coordinator(s)? (33.1-24-03-28(9)(a))

		Are employees familiar with proper waste handling and emergency response procedures? (33.1-24-03-28(9)(c))
Comments:		

Manifests and Land Disposal Restrictions Checklist		
Yes	**No**	
		Are the manifests properly completed? (33.1-24-03-04 & Appendix I)
		Are the manifests properly signed? (33.1-24-03-07 & Appendix I)
		Are the descriptions on manifests similar to waste stream descriptions? (33.1-24-03 Appendix I)
		Are copies of manifests maintained for at least 3 years for wastes shipped offsite? (33.1-24-03-13(1))
		Have any manifests not been returned from the TSDF during the last year and were they reported to the NDDEQ? (33.1-24-03-15(3))
		Does the generator have a contractual agreement to remove solvent wastes? Is a copy maintained for 3 years? (33.1-24-03-04(5)(b)) (Note to inspectors: If the facility has a reclamation agreement with a solvent recycling company to recycle and return solvents, a manifest for each shipment is not required.)
		Is a one-time written LDR notification present for each waste stream? (33.1-24-05-256) (Note to Inspectors: No further notification is necessary until the waste or the TSDR change.)
		Does the LDR notification indicate appropriate treatment standards? (33.1-24-05-256)
		Are waste codes on LDR the same as the manifests? (33.1-24-05-256)
		Are LDRs maintained for 3 years after TSD verification? (33.1-24-05-256(1)(h))
Comments:		

Solvent Contaminated Wipes (33.1-24-02-04(1)(w) & (2)(p))		
Yes	**No**	
		Are the containers labeled “excluded solvent-contaminated wipes”?
		Is the container closed? (container is considered closed when there is complete contact between the fitted lid and the rim)
		Are the containers being removed one-hundred and eighty days from the start date of accumulation?
		Do they have the following documentation? • Name and address of the laundry or dry cleaner that received the wipes for laundering or the landfill sent for disposal. • Documentation that the 180-day accumulation time limit is being met • Description of the process used to ensure no free liquids were in the container prior to shipment

Accumulation Area Checklist		
Yes	**No**	
		Is emergency response information posted near the phone? (33.1-24-03-28(9)(b))
		Are quantities accumulated within the limits? Time less than 180 days (270 days if 200 miles plus)? (33.1-24-03-28(11)) Maximum accumulation limit of 6000 kg? (33.1-24-03-28(2)(a))
		Is the central accumulation area inspected at least once a week? (33.1-24-03-28(2)(b)(5))

Accumulation Storage Area (33.1-24-03-28(2)(b) and 33.1-24-03-28-(6)(a))						
Waste Type	**No. of containers**	**Dated Y/N**	**Labeled/ Marked Y/N**	**Closed Y/N**	**Good Condition Y/N**	**Hazards Label Y/N**

Satellite Accumulation Area Checklist		
Location:		
Wastes:		
Yes	**No**	
		Is there less than 55 gallons of non-acute, or 1 quart of acute, hazardous waste present per waste stream? (33.1-24-03-27)
		Is the container at or near the point of generation and under the control of the operator? (33.1-24-03-27)
		Is the container marked or labeled with the words hazardous waste? (33.1-24-03-27(5)(a))
		Have the containers been marked with the hazards of the wastes contained therein (pictogram)? (33.1-24-03-27(5)(b))
		Is the container closed? (33.1-24-03-27(4))
		Have full containers been removed from the satellite accumulation area within three consecutive calendar days and is it dated from the day it was filled? (33.1-24-03-27(6)(b)&(c))

Satellite Accumulation Area Checklist		
Location:		
Wastes:		
Yes	**No**	
		Is there less than 55 gallons of non-acute, or 1 quart of acute, hazardous waste present per waste stream? (33.1-24-03-27)
		Is the container at or near the point of generation and under the control of the operator? (33.1-24-03-27)
		Is the container marked or labeled with the words hazardous waste? (33.1-24-03-27(5)(a))
		Have the containers been marked with the hazards of the wastes contained therein (pictogram)? (33.1-24-03-27(5)(b))
		Is the container closed? (33.1-24-03-27(4))
		Have full containers been removed from the satellite accumulation area within three consecutive calendar days and is it dated from the day it was filled? (33.1-24-03-27(6)(b)&(c))

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Wastes:		
Yes	**No**	
		Is there less than 55 gallons of non-acute, or 1 quart of acute, hazardous waste present per waste stream? (33.1-24-03-27)
		Is the container at or near the point of generation and under the control of the operator? (33.1-24-03-27)
		Is the container marked or labeled with the words hazardous waste? (33.1-24-03-27(5)(a))
		Have the containers been marked with the hazards of the wastes contained therein (pictogram)? (33.1-24-03-27(5)(b))
		Is the container closed? (33.1-24-03-27(4))
		Have full containers been removed from the satellite accumulation area within three consecutive calendar days and is it dated from the day it was filled? (33.1-24-03-27(6)(b)&(c))

Satellite Accumulation Area Checklist		
Location:		
Wastes:		
Yes	**No**	
		Is there less than 55 gallons of non-acute, or 1 quart of acute, hazardous waste present per waste stream? (33.1-24-03-27)
		Is the container at or near the point of generation and under the control of the operator? (33.1-24-03-27)
		Is the container marked or labeled with the words hazardous waste? (33.1-24-03-27(5)(a))
		Have the containers been marked with the hazards of the wastes contained therein (pictogram)? (33.1-24-03-27(5)(b))
		Is the container closed? (33.1-24-03-27(4))
		Have full containers been removed from the satellite accumulation area within three consecutive calendar days and is it dated from the day it was filled? (33.1-24-03-27(6)(b)&(c))

Used Oil Checklist		
Yes	**No**	
		Is the facility storing used oil: Tank: Aboveground Size:_____ Gallons Underground Size:_____Gallons Container: Number:_____ Size:_____
		Are the containers in good condition and not leaking? (33.1-24-05-622(2))
		Are the containers labeled or clearly marked as Used Oil? (33.1-24-05-622(3)(a)) If it is an underground tank, are the fill pipes labeled? (33.1-24-05-622(3)(b))
		Have any spills or releases been cleaned up? (33.1-24-05-622(4))
		Does the facility have any space heaters? How many? _____ (33.1-24-05-623)
		Is the used oil shipped offsite? Used Oil Jobber: _____ (33.1-24-05-624)
Comments:		

Universal Waste Checklist		
Yes	**No**	
		Is the facility managing universal wastes? (33.1-24-05-709) Circle size: Small Quantity handler of universal waste (Less than 5K Kilograms) Large Quantity handler of Universal waste – If so, have they notified?
		Have the employees who handle the waste been informed of the proper handling and emergency procedures appropriate for the type or types of universal waste handled at the facility? (33.1-24-05-716)
		Batteries: is each battery or the container labeled “Universal Waste-Battery(ies)”, “Waste Battery(ies)” or “Used Battery(ies)”? (33.1-24-05-714(1))
		Mercury-containing equipment: is each device or container labeled “Universal Waste-Mercury Containing Equipment”, “Waste Mercury Containing Equipment” or “Used Mercury Containing Equipment”? (33.1-24-05-714(4))
		Lamps: is each lamp or a container or package labeled “Universal Waste-Lamp(s)”, “Waste Lamp(s)” or “Used Lamp(s)”? (33.1-24-05-714(5))
		Pesticides: Are the containers labelled with the original label and the words “Universal Waste-Pesticide(s)” (33.1-24-05-714(2))
		Aerosol cans : Is each aerosol can, or a container in which aerosol cans are contained must be labeled or marked clearly with any of the following phrases: "Universal Waste - Aerosol Can(s)"; "Waste Aerosol Can(s)"; or "Used Aerosol Can(s)". (33.1-24-05-713(6)

		d. Does the facility puncture the aerosol cans? If so: (33.1-24-05-713(5)(d) 1. Do they conduct puncturing and draining activities using a device specifically designed to safely puncture aerosol cans and effectively contain the residual contents and any emissions thereof; 2. Do they have a written procedure detailing how to safely puncture and drain the universal waste aerosol can, including proper assembly, operation, and maintenance of the unit; segregation of incompatible wastes; and proper waste management practices to prevent fires or releases; 3. Maintain an onsite copy of the manufacturer's specification and instructions for any can puncturing devices used onsite; 4. Are the employees operating can puncturing devices appropriately, and have been trained; 5. Is the puncturing of the can is done in a manner designed to prevent fires and to prevent the release of any component of universal waste to the environment and the area is well-ventilated; 6. Are the contents from the waste aerosol can or puncturing device, emptied into container or tank that meets the applicable requirements of sections 33.1-24-03-26 through 33.1-24-03-29; 7. Have they conducted a hazardous waste determination on the contents of the emptied aerosol can? 8. If the contents are determined to be nonhazardous, the handler may manage the waste in any way that is in compliance with applicable state solid waste requirements; and 9. Is a written procedure in place in the event of a spill or leak, and a spill cleanup kit must be provided? All spills or leaks of the contents of aerosol cans must be cleaned up promptly.
		Container closed, structurally sound, compatible with the contents and free of leaks, spills or damage? (33.1-24-05-713(1)(a), 713(2)(a), 713(3)(a) and 713(4)(a))
		Can the handler prove that the universal wastes are stored less than one year? (33.1-24-05-715(1) & (3))
Comments:		

Episodic Generation Checklist		
Yes	**No**	
		Did the generator conduct a planned episodic event? Date of Event:
		Did the generator conduct an unplanned episodic event? Date of Event:
		Was more than one episodic event conducted in a calendar year? Date of 1st event: Date of 2nd event: Date(s) of additional event(s):
		If more than one event was conducted in a calendar year, was a petition submitted to the NDDEQ for an additional event? (33.1-24-03-34(4))
		Was proper notification given to the NDDEQ? Min. 30 days prior to planned event; no more than 3 days after an unplanned event. (33.1-24-03-34(3)(b))
		Were episodic wastes accumulated in containers? (33.1-24-03-34(3)(d)(1))

		Were episodic wastes accumulated in tanks? (33.1-24-03-34(3)(d)(2))
		Are hazardous waste tanks or containers labeled with the words “episodic hazardous waste” and the hazards of the waste? (33.1-24-03-34(3)(d)(1) & (2))
		Have episodic hazardous wastes been accumulated on-site for less than sixty (60) days from the date of generation? (33.1-24-03-34(2)(e) & (3)(e)
		Are records being maintained at the site for a minimum of 3 years after the episodic event?

GENERATOR CATEGORY REFERENCE TABLE

Quantity of acute hazardous waste generated in a calendar month	**Quantity of a non-acute hazardous waste generated in a calendar month**	**Quantity of residues from a cleanup of acute hazardous waste generated in a calendar month**	**Generator category**
Greater than 1 kg (2.2 lbs)	Any amount	Any amount	Large quantity generator
Any amount	Greater than or equal to 1,000 kg (2,200 lbs)	Any amount	Large quantity generator
Any amount	Any amount	Greater than 100 kg (220 lbs)	Large quantity generator
Less than or equal to 1 kg (2.2 lbs)	Between 100 kg (220 lbs) and 1,000 kg (2,200 lbs)	Less than or equal to 100 kg (220 lbs)	Small quantity generator
Less than or equal to 1 kg (2.2 lbs)	Less than or equal to 100 kg (220 lbs)	Less than 100 kg (220 lbs)	Very small quantity generator

Additional Comments:

Post-inspection review:

Conduct exit interview with facility contact. The interview should include observations made during the inspections, and recommendations on these observations. List questions raised during the inspection. Discuss all obvious violations of the rules.

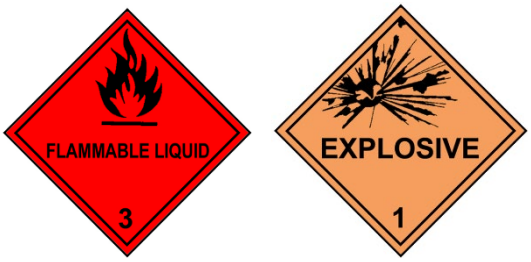
State overall compliance status will be determined after reviewing inspection results with supervisors and the issuance of an inspection report.

Issue a Notice of Inspection form.

Do not discuss potential civil or criminal actions.

Examples of markings (pictograms) that indicate the "Hazards"

Hazard communication consistent with DOT (49 CFR part 172 subpart E – labeling or subpart F – placarding)



Hazard statement or pictogram consistent with OSHA (29 CFR 1910.1200)

National Fire Protection Association code 704

The applicable hazardous waste characteristic (i.e., ignitable, corrosive, reactive, toxic)