## SMALL QUANTITY GENERATOR CHECKLIST

**COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

**CESQG**: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

**SQG**: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

**LQG**: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.

**NOTE**: To convert from gallons to pounds: \( \text{Amount in gallons} \times \text{Specific Gravity} \times 8.345 = \text{Amounts in pounds} \).

**Safety Equipment Used:**

### GENERAL REQUIREMENTS

<table>
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<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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<tbody>
<tr>
<td>1. Have all wastes generated at the facility been adequately evaluated?</td>
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<td>[3745-52-11]</td>
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<td>2. Are records of all waste determination being kept for at least 3 years?</td>
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<td>[3745-52-40(C)]</td>
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<td>3. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]</td>
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<td>4. Has the generator transported or caused hazardous waste to be transported to a facility NOT authorized to manage the hazardous waste? [ORC 3734.02 (F)]</td>
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<td>5. Has the generator disposed of hazardous waste on-site without a permit or at another facility NOT authorized to dispose of hazardous waste? [ORC 3734.02 (E) &amp; (F)]</td>
<td>Yes</td>
<td>No</td>
<td>N/A</td>
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<td>6. Does the generator accumulate hazardous waste?</td>
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**NOTE**: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.

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<th>Requirement</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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<tr>
<td>7. Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734.02(E)&amp;(F)]</td>
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<td>8. Is the generator accumulating more than 6,000 kg of hazardous waste on site? [3745-52-34(D)(1) ORC §3734.02(E)&amp;(F)]</td>
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<td><strong>NOTE</strong>: SQG’s shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]</td>
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<td>9. Does the generator treat hazardous waste? If so, is treatment done in one of the following units?: [3745-52-34(D)]</td>
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<tr>
<td>a. Container that meets 3745-66-70 to 3745-66-74 and 3745-66-77? [3745-52-34(D)(2)]</td>
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<td>b. Tank that meets 3745-66-101? [3745-52-34(D)(3)] If so, complete tank checklist</td>
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<td>If a. and b. are both No, the facility is in violation of ORC 3734.02(E) &amp; (F)</td>
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[Facility Name/Inspection Date]

[ID number]

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**MANIFEST REQUIREMENTS**

10. Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)]  
   Yes ☐ No ☐ N/A ☐

11. Are wastes reclaimed under a contractual agreement? If so: [3745-52-20(E)]  
   a. Does the contractual agreement specify the type of waste and frequency of shipments?  
      Yes ☐ No ☐ N/A ☐
   b. Is the transport vehicle owned and operated by the reclaimer?  
      Yes ☐ No ☐ N/A ☐
   c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?  
      Yes ☐ No ☐ N/A ☐

   **NOTE:** If the answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A)& (B) 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.

12. Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(B)]  
   Yes ☐ No ☐ N/A ☐

   **NOTE:** U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be completed. [3745-52-20(A)(1)]

13. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]  
   Yes ☐ No ☐ N/A ☐

   **NOTE:** The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]

14. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate another facility or instruct the transporter to return the waste? [3745-52-20(D)]  
   Yes ☐ No ☐ N/A ☐

15. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]  
   Yes ☐ No ☐ N/A ☐

   **NOTE:** Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.

16. Did the generator receive a rejected load or residue? If so, did the generator:  
   a. Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)]  
      Yes ☐ No ☐ N/A ☐
   b. Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]  
      Yes ☐ No ☐ N/A ☐
   c. Within 30 days after delivery, send a copy of the manifest to the designated facility that returned the shipment? [3745-52-23(F)(3)]  
      Yes ☐ No ☐ N/A ☐

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[Facility Name/Inspection Date]  
[ID number]  
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17. If the generator did not receive a return copy of each completed manifest within 60 days after being accepted by the transporter, did the generator submit to Ohio EPA a legible copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]

Yes ☐ No ☐ N/A ☐

18. Are signed copies of all manifests being retained for at least three years? [3745-52-40]

Yes ☐ No ☐ N/A ☐

**NOTE:** A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]

**NOTE:** Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered “on-site” and manifesting and transporter requirements must be met. To transport “along” a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be “off-site.” For additional information see the definition of “on-site” in OAC rule 3745-50-10.

### PREPAREDNESS AND PREVENTION

19. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]

Yes ☐ No ☐ N/A ☐

20. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

   a. Name and telephone number of emergency coordinator?

   Yes ☐ No ☐ N/A ☐

   b. Location of fire extinguishers and spill control equipment, and, if present, fire alarm(s)?

   Yes ☐ No ☐ N/A ☐

   c. Telephone number of local fire department, unless the facility has a direct alarm?

   Yes ☐ No ☐ N/A ☐

21. Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]

   Yes ☐ No ☐ N/A ☐

22. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]

   Yes ☐ No ☐ N/A ☐

23. Is the facility maintained and operated to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste? [3745-65-31]

   Yes ☐ No ☐ N/A ☐

24. Does the generator have the following equipment at the facility, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:

   a. Internal communications or alarm system capable of providing immediate emergency instructions (voice or signal) to facility personnel? [3745-65-32(A)]

   Yes ☐ No ☐ N/A ☐

   b. A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance? [3745-65-32(B)]

   Yes ☐ No ☐ N/A ☐

   c. Portable fire extinguishers, fire control equipment, spill control equipment, and decon equipment? [3745-65-32(C)]?

   Yes ☐ No ☐ N/A ☐

   d. Water of adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems? [3745-65-32(D)]

   Yes ☐ No ☐ N/A ☐

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25. Is emergency equipment tested (inspected) and maintained as necessary to ensure its proper operation in time of emergency? [3745-65-33]
   a. Are inspections recorded in a log or summary? [3745-65-33]

26. Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, do all personnel involved in the operation have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee (unless the device is not required under 3745-65-32)? [3745-65-34(A)]

27. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]

28. Is adequate aisle space provided for unobstructed movement of personnel, fire protection equipment, spill control equipment, and decon equipment to any area of facility operation in an emergency (unless not needed for any of the above-mentioned purposes)? [3745-65-35]

29. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]

30. Where authorities have declined to enter into arrangements, has the generator documented such a refusal? [3745-65-37(B)]

SATELLITE ACCUMULATION AREA REQUIREMENTS

31. Does the generator have satellite accumulation area(s)? If so, does the generator ensure that satellite accumulation area(s):
   a. Are at or near a point of generation? [3745-52-34(C)(1)]
   b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]
   c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]
   d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]
   e. Containers are closed, in good condition, and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]
   f. Containers are marked with the words “Hazardous Waste” or other words identifying the contents? [3745-52-34(C)(1)(b)]

32. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
   a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]
   b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

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### USE AND MANAGEMENT OF CONTAINERS

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<tr>
<td>33.</td>
<td>Has the generator marked containers with the words &quot;Hazardous Waste?&quot; [3745-52-34(D)(4)]</td>
<td>Yes ☐</td>
<td>No ☐</td>
<td>N/A ☐</td>
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<tr>
<td>34.</td>
<td>Is the accumulation date on each container? [3745-52-34(D)(4)]</td>
<td>Yes ☐</td>
<td>No ☐</td>
<td>N/A ☐</td>
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<td>35.</td>
<td>Are hazardous wastes stored in containers which are:</td>
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<tr>
<td>a.</td>
<td>Closed (except when adding/removing wastes)? [3745-66-73(A)]</td>
<td>Yes ☐</td>
<td>No ☐</td>
<td>N/A ☐</td>
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<td>b.</td>
<td>In good condition? [374-66-71(A)]</td>
<td>Yes ☐</td>
<td>No ☐</td>
<td>N/A ☐</td>
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<td>c.</td>
<td>Compatible with wastes stored in them? [3745-66-72(A)]</td>
<td>Yes ☐</td>
<td>No ☐</td>
<td>N/A ☐</td>
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<td>d.</td>
<td>Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]</td>
<td>Yes ☐</td>
<td>No ☐</td>
<td>N/A ☐</td>
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**NOTE:** Record location on process summary sheets and photograph the area.

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<td>36.</td>
<td>Is the container accumulation area(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74(A)]</td>
<td>Yes ☐</td>
<td>No ☐</td>
<td>N/A ☐</td>
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<tr>
<td>a.</td>
<td>Are inspections recorded in a log or summary? [3745-66-74(A)]</td>
<td>Yes ☐</td>
<td>No ☐</td>
<td>N/A ☐</td>
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<td>37.</td>
<td>Are containers holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers separated from the other materials or protected from them by means of a dike, berm, wall, or other device? [3745-66-77(A)]</td>
<td>Yes ☐</td>
<td>No ☐</td>
<td>N/A ☐</td>
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<td>38.</td>
<td>If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with [3745-66-17(B)]? [3745-66-77(A)]</td>
<td>Yes ☐</td>
<td>No ☐</td>
<td>N/A ☐</td>
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<td>39.</td>
<td>If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with [3745-66-17(B)]? [3745-66-77(B)]</td>
<td>Yes ☐</td>
<td>No ☐</td>
<td>N/A ☐</td>
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**NOTE:** OAC \[3745-66-17(B)] requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

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**In General:**

Reactives must be segregated from Ignitables
Acids must be segregated from Caustics
Corrosives should be segregated from Flammables
Oxidizers should be segregated from EVERYTHING.
Many corrosives are water-reactive.
Most reactive organics must be segregated from inorganic reactive (metals).

**INCOMPATIBLE WASTES** - Some Deadly Combinations –

- Acids + Oil or Grease = FIRE
- Acids + Caustics = HEAT/SPATTERING
- Caustics + Epoxies = EXTREME HEAT
- Chlorine Gas + Acetylene = EXPLOSION
- Flammable Liquids + Hydrogen Peroxide = FIRE/EXPLOSION
- Aluminum Powder + Ammonium Nitrate = EXPLOSION
### PRE-TRANSPORT REQUIREMENTS

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<td>40.</td>
<td>Does each generator package, label, and mark its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]</td>
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<td>Yes ☐ No ☐ N/A ☐</td>
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<tr>
<td>41.</td>
<td>Does each container ≤119 gallons have label marked with the following words? [3745-52-32(B)] “Hazardous waste – Federal law prohibits improper disposal. If found, contact the nearest police or public safety authority, or the United States Environmental Protection Agency. Generator’s name and address    Generator’s U.S. EPA identification number    Manifest document number”</td>
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<td>Yes ☐ No ☐ N/A ☐</td>
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<td>42.</td>
<td>Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]</td>
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<td>Yes ☐ No ☐ N/A ☐</td>
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